



**Air Quality
TIER I OPERATING PERMIT**

**State of Idaho
Department of Environmental Quality**

PERMIT No.: T1-060315

FACILITY ID No.: 011-00012

AQCR: 61

CLASS: A

SIC: 2034

ZONE: 12

UTM COORDINATE (km): 387.7, 4784.0

1. PERMITTEE

Blackfoot Facility of Basic American Foods (BAF), a Division of Basic American, Inc.

2. PROJECT

Tier I Operating Permit Renewal

3. MAILING ADDRESS

415 W. Collins Road

CITY

Blackfoot

STATE

ID

ZIP

83221

4. FACILITY CONTACT

Deloris Aguilar

TITLE

Environmental Superintendent

TELEPHONE

(208) 785-8590

5. RESPONSIBLE OFFICIAL

Nelson Rovig

TITLE

Director of Operations

TELEPHONE

(208) 785-8590

6. EXACT PLANT LOCATION

415 W. Collins Road, Blackfoot, ID

COUNTY

Bingham

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Dehydrated Food Products and Animal Feed

8. PERMIT AUTHORITY

This Tier I operating permit is issued pursuant to Idaho Code §39-115 and the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.300 through 386. The permittee shall comply with the terms and conditions of this permit.

This permit incorporates all applicable terms and conditions of prior air quality permits issued by the Idaho Department of Environmental Quality (DEQ) for the permitted source, unless the permittee emits toxic pollutants subject to state-only requirements pursuant to IDAPA 58.01.01.210, and the permittee elects not to incorporate those terms and conditions into this operating permit.

The effective date of this permit is the date of signature by DEQ on the cover page.

ZACH KLOTOVICH, PERMIT WRITER

DEPARTMENT OF ENVIRONMENTAL QUALITY

MIKE SIMON, STATIONARY SOURCE PROGRAM MANAGER

DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED:

DRAFT

DATE MODIFIED/AMENDED:

DATE EXPIRES:

Table of Contents

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE	3
1. TIER I OPERATING PERMIT SCOPE	4
2. FACILITY-WIDE CONDITIONS	5
3. BOILER 1, BOILER 2, AND BOILER 3	13
4. PROCESS A	27
5. PROCESS B	29
6. PROCESS C	31
7. COMPLIANCE SCHEDULE.....	33
8. INSIGNIFICANT ACTIVITIES	36
9. NONAPPLICABLE REQUIREMENTS	38
10. TIER I OPERATING PERMIT GENERAL PROVISIONS	39
ATTACHMENT A – EPA APPROVAL OF ALTERNATIVE TO COMS	

Acronyms, Units, and Chemical Nomenclature

AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
Btu	British thermal unit
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
gpm	gallons per minute
gr	grain (1 lb = 7,000 grains)
HAPs	hazardous air pollutants
hp	horsepower
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
m	meter(s)
MMBtu	million British thermal units
MMscf/yr	million standard cubic feet per year
NESHAP	Nation Emission Standards for Hazardous Air Pollutants
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD	Prevention of Significant Deterioration
PTC	permit to construct
Rules	Rules for the Control of Air Pollution in Idaho
scf	standard cubic feet
SIC	Standard Industrial Classification
SM	synthetic minor
SO ₂	sulfur dioxide
SO _x	sulfur oxides
T/yr	tons per year
U.S.C.	United States Code
UTM	Universal Transverse Mercator
VOC	volatile organic compound

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-060315**Permittee:** Basic American Foods**Location:** Blackfoot, Idaho**Facility ID No.** 011-00012**1. TIER I OPERATING PERMIT SCOPE*****Purpose***

1.1 This Tier I operating permit establishes facility-wide requirements in accordance with the Idaho State Implementation Plan control strategy and the *Rules*.

1.2 This Tier I renewal supersedes the following permit(s):

- Tier I Operating Permit No. T1-050308, issued October 4, 2005

Regulated Sources

1.3 Table 1.1 lists all sources of emissions regulated in this Tier I operating permit.

Table 1.1 REGULATED SOURCES

Permit Section	Source Description	Emissions Control(s)
3	<u>Boiler 1</u> Manufacturer: Murray Rated heat capacity: 57 MMBtu/hr Maximum steam rate: 45,500 lb/hr Fuels: natural gas, # 6 oil, # 2 oil	<u>Wet Scrubber</u> Manufacturer: Carbo-Tech Environmental Group, Inc. Model: 48x48-96HE Venturi type wet scrubber system used whenever Boilers 1 or 2 are combusting fuel oil. Monitoring: SO ₂ emissions continuously monitored
3	<u>Boiler 2</u> Manufacturer: Johnson 509 series Rated heat capacity: 75.4 MMBtu/hr Maximum steam rate: 62,100 lb/hr Fuels: natural gas, # 6 oil, # 2 oil	<u>Wet Scrubber</u> Manufacturer: Carbo-Tech Environmental Group, Inc. Model: 48x48-96HE Venturi type wet scrubber system used whenever Boilers 1 or 2 are combusting fuel oil. Monitoring: SO ₂ emissions continuously monitored
3	<u>Boiler 3</u> Manufacturer: Springfield model 52 Rated heat capacity: 39 MMBtu/hr Maximum steam rate: 30,000 lb/hr Fuels: natural gas, # 2 oil	None
4	<u>Process A</u> Dehydrated potato products	None
5	<u>Process B</u> Dehydrated potato products	None
6	<u>Process C</u> Dehydrated food products	None

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-060315

Permittee:	Basic American Foods	Facility ID No. 011-00012
Location:	Blackfoot, Idaho	

2. FACILITY-WIDE CONDITIONS

The following table contains a summary of requirements that apply generally to emissions units at the facility.

Table 2.1 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring & Recordkeeping Requirements
2.1	Fugitive emissions	All reasonable precautions shall be taken to prevent emissions.	IDAPA 58.01.01.650-651	2.2, 2.3, 2.4, 2.11
2.5	Odorous gas, liquids, or solids	No emissions causing air pollution shall be released.	IDAPA 58.01.01.775-776	2.6, 2.11
2.7	Visible emissions	Emissions with at least 20% opacity shall be emitted for no more than three (3) minutes in any 60 minute period.	IDAPA 58.01.01.625	2.8, 2.11
2.9	Excess emissions	Compliance with IDAPA 58.01.01.130-136	IDAPA 58.01.01.130	2.9-2.9.5, 2.11
2.10	Performance Testing	Compliance testing shall be conducted in accordance with IDAPA 58.01.01.157	IDAPA 58.01.01.157	2.11, 2.12
2.13	Fuel-burning equipment PM standard	Grain loading limits according to fuel type shall be observed.	IDAPA 58.01.01.676-677	2.11
2.14	Fuel oil sulfur content limit	ASTM Grade 1 fuel oil – 0.3% by weight; ASTM Grade 2 fuel oil – 0.5% by weight	IDAPA 58.01.01.728	2.11, 2.14.1
2.15	Open burning	Compliance with IDAPA 58.01.01.600-617	IDAPA 58.01.01.600-617	2.11
2.16	Asbestos	Compliance with 40 CFR 61 subpart M during any construction activities.	40 CFR 61, Subpart M	2.11
2.17	Chemical accident prevention	Compliance with 40 CFR 68.215(a)(2)	40 CFR 68.215(a)(2); IDAPA 58.01.01.322.11, 5/1/94; 40 CFR 70.6(c)(5)	2.11
2.18	Recycling and emissions reduction	Reduce emission of Class I and Class II refrigerants in accordance with 40 CFR 82, Subpart F	40 CFR 82, Subpart F	2.11

Fugitive Dust

- 2.1 All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651.

[IDAPA 58.01.01.650-651, 5/1/94]
- 2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive dust emissions.

[IDAPA 58.01.01.322.06, 07, 5/1/94]
- 2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-060315		
Permittee:	Basic American Foods	Facility ID No. 011-00012
Location:	Blackfoot, Idaho	

following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

- 2.4 The permittee shall conduct a quarterly facility-wide inspection of potential sources of fugitive dust emissions, during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive dust emissions are effective. If fugitive dust emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive dust emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive dust emissions, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

Odors

- 2.5 The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.
- 2.6 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken. Land Application Permit No. LA-000039-02 regulates odor control for remotely located wastewater treatment farms operated by BAF. Compliance with requirements of the current land application permit pertaining to odors will be deemed compliance with the odor rules of IDAPA 58.01.01.322 as they apply to remotely located wastewater treatment farms.

[IDAPA 58.01.01.775-776 (state-only), 5/1/94]

[IDAPA 58.01.01.322.06, 07 (state-only), 5/1/94]

Visible Emissions

- 2.7 The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.
- 2.8 The permittee shall conduct a quarterly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. The inspection shall consist of a see/no see evaluation for each potential source of visible emissions. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136.

[IDAPA 58.01.01.625, 4/5/00]

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-060315		
Permittee:	Basic American Foods	Facility ID No. 011-00012
Location:	Blackfoot, Idaho	

The permittee shall maintain records of the results of each visible emission inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

Excess Emissions

Excess Emissions - General

- 2.9 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions. The provisions of IDAPA 58.01.01.130-136 shall govern in the event of conflicts between Permit Condition 2.9 and the regulations of IDAPA 58.01.01.130-136.
- 2.9.1 The person responsible for or in charge of a facility during an excess emissions event shall, with all practicable speed, initiate and complete appropriate and reasonable action to correct the conditions causing the excess emissions event; to reduce the frequency of occurrence of such events; to minimize the amount by which the emission standard is exceeded; and shall, as provided below or upon request of DEQ, submit a full report of such occurrence, including a statement of all known causes, and of the scheduling and nature of the actions to be taken.

[IDAPA 58.01.01.132, 4/5/00]

Excess Emissions – Startup, Shutdown, Scheduled Maintenance

- 2.9.2 In all cases where startup, shutdown, or scheduled maintenance of any equipment or emission unit is expected to result or results in an excess emissions event, the owner or operator of the facility or emissions unit generating the excess emissions shall demonstrate compliance with IDAPA 58.01.01.133.01(a) through (d), including, but not limited to, the following:
- [IDAPA 58.01.01.133, 4/5/00]
- A prohibition of any scheduled startup, shutdown, or maintenance resulting in excess emissions shall occur during any period in which an Atmospheric Stagnation Advisory or a Wood Stove Curtailment Advisory has been declared by DEQ.
- [IDAPA 58.01.01.133.01.a, 3/20/97]
- Notifying DEQ of the excess emissions event as soon as reasonably possible, but no later than two hours prior to, the start of the event, unless the owner or operator demonstrates to DEQ's satisfaction that a shorter advance notice was necessary.
- [IDAPA 58.01.01.133.01.b, 4/5/00]
- The owner or operator of a source of excess emissions shall report and record the information required pursuant to Permit Conditions 2.9.4 and 2.9.5 and IDAPA 58.01.01.135 and 136 for each excess emissions event due to startup, shutdown, or scheduled maintenance.
- [IDAPA 58.01.01.133.01.c, 3/20/97]

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-060315		
Permittee:	Basic American Foods	Facility ID No. 011-00012
Location:	Blackfoot, Idaho	

Excess Emissions – Upset, Breakdown, or Safety Measures

- 2.9.3 In all cases where upset or breakdown of equipment or an emissions unit, or the initiation of safety measures, results or may result in an excess emissions event, the owner or operator of the facility or emissions unit generating the excess emissions shall demonstrate compliance with IDAPA 58.01.01.134.01(a) and (b) and the following:

[IDAPA 58.01.01.134, 4/5/00]

- 2.9.3.1 For all equipment or emissions units from which excess emissions result during upset or breakdown conditions, or for other situations that may necessitate the implementation of safety measures which cause excess emissions, the facility owner or operator shall comply with the following:

[IDAPA 58.01.01.134.02, 4/5/00]

- The owner or operator shall immediately undertake all appropriate measures to reduce and, to the extent possible, eliminate excess emissions resulting from the event and to minimize the impact of such excess emissions on the ambient air quality and public health.

[IDAPA 58.01.01.134.02.a, 4/5/00]

- The owner or operator shall notify DEQ of any upset, breakdown, or safety event that results in excess emissions. Such notification shall identify the time, specific location, equipment or emissions unit involved, and (to the extent known) the cause(s) of the occurrence. The notification shall be given as soon as reasonably possible, but no later than 24 hours after the event, unless the owner or operator demonstrates to DEQ's satisfaction that the longer reporting period was necessary.

[IDAPA 58.01.01.134.02.b, 4/5/00]

- The owner or operator shall report and record the information required pursuant to Permit Conditions 2.9.4 and 2.9.5 and IDAPA 58.01.01.135 and 136 for each excess emissions event caused by an upset, breakdown, or safety measure.

[IDAPA 58.01.01.134.02.c, 3/20/97]

- 2.9.3.2 During any period of excess emissions caused by upset, breakdown, or operation under facility safety measures, DEQ may require the owner or operator to immediately reduce or cease operation of the equipment or emissions unit causing the period until such time as the condition causing the excess has been corrected or brought under control. Such action by DEQ shall be taken upon consideration of the factors listed in IDAPA 58.01.01.134.03 and after consultation with the facility owner or operator.

[IDAPA 58.01.01.134.03 4/5/00]

Excess Emissions – Reporting and Recordkeeping

- 2.9.4 A written report for each excess emissions event shall be submitted to DEQ by the owner or operator no later than 15 days after the beginning of such an event. Each report shall contain the information specified in IDAPA 58.01.01.135.02.

[IDAPA 58.01.01.135.01 and 02, 3/20/97]

- 2.9.5 The owner or operator shall maintain excess emissions records at the facility for the most recent five-calendar-year period. The excess emissions records shall be made available to DEQ upon request and shall include the information requested by IDAPA 58.01.01.136.03(a) and (b) as summarized in the following:

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-060315		
Permittee:	Basic American Foods	Facility ID No. 011-00012
Location:	Blackfoot, Idaho	

[IDAPA 58.01.01.136.01, 02, 3/20/97; IDAPA 58.01.01.136.03, 4/5/00]

- An excess emissions record book for each emissions unit or piece of equipment containing copies of all reports that have been submitted to DEQ pursuant to IDAPA 58.01.01.135 for the particular emissions unit or equipment; and

[IDAPA 58.01.01.136.03.a, 4/5/00]

- Copies of all startup, shutdown, and scheduled maintenance procedures and upset, breakdown, or safety preventative maintenance plans that have been developed by the owner or operator in accordance with IDAPA 58.01.01.133 and 134, and facility records as necessary to demonstrate compliance with such procedures and plans.

[IDAPA 58.01.01.136.03.b, 3/20/97]

Performance Testing

- 2.10 If performance testing is required, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test or shorter time period as provided in a permit, order, consent decree, or by DEQ approval. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests such testing not be performed on weekends or state holidays.

All testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, prior to conducting any performance test, the permittee is encouraged to submit in writing to DEQ, at least 30 days in advance, the following for approval:

- The type of method to be used
- Any extenuating or unusual circumstances regarding the proposed test
- The proposed schedule for conducting and reporting the test

Except as specified elsewhere in this permit, the permittee shall submit a compliance test report for the respective test to DEQ within 30 days following the date in which a compliance test required by this permit is concluded. The compliance test report shall include all process operating data collected during the test period as well as the test results, raw test data, and associated documentation, including any approved test protocol.

The proposed test date(s), test date rescheduling notice(s), compliance test report, and all other correspondence shall be sent to the following address:

Air Quality Permit Compliance
Department of Environmental Quality
Pocatello Regional Office
444 Hospital Way, #300,
Pocatello, ID 83201
Phone: (208) 236-6160 Fax: (208) 236-6168

[IDAPA 58.01.01.157, 4/5/00; IDAPA 58.01.01.322.06, 08.a, 09, 5/1/94]

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-060315		
Permittee:	Basic American Foods	Facility ID No. 011-00012
Location:	Blackfoot, Idaho	

Monitoring and Recordkeeping

- 2.11 The permittee shall maintain sufficient records to assure compliance with all of the terms and conditions of this operating permit. Records of monitoring information shall include, but not be limited to, the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.322.07, 5/1/94]

- 2.11.1 During periods when a process or activity is shut down or not operating, monitoring requirements for that process are suspended. In these circumstances, monitoring reports submitted shall note that the process was shut down or not operating, and shall provide, as applicable, the dates of shutdown and start-up.

[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

Reports and Certifications

- 2.12 All periodic reports and certifications required by this permit shall be submitted to DEQ within 30 days of the end of each specified reporting period. Excess emissions reports and notifications shall be submitted in accordance with IDAPA 58.01.01.130-136. Reports, certifications, and notifications shall be submitted to:

Air Quality Permit Compliance
Department of Environmental Quality
Pocatello Regional Office
444 Hospital Way, #300,
Pocatello, ID 83201
Phone: (208) 236-6160 Fax: (208) 236-6168

The periodic compliance certification required by General Provision 21 shall also be submitted within 30 days of the end of the specified reporting period to:

EPA Region 10
Air Operating Permits, OAQ-107
1200 Sixth Ave.
Seattle, WA 98101

[IDAPA 58.01.01.322.08, 11, 5/1/94]

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-060315		
Permittee:	Basic American Foods	Facility ID No. 011-00012
Location:	Blackfoot, Idaho	

Fuel-Burning Equipment

- 2.13 The permittee shall not discharge PM to the atmosphere from any fuel-burning equipment in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas, 0.050 gr/dscf of effluent gas corrected to 3% oxygen by volume for liquid fuel.

[IDAPA 58.01.01.676-677, 5/1/94]

- 2.13.1 For fuel-burning equipment in operation prior to October 1, 1979, or with a maximum rated input of 10 MMBtu/hr or less, the permittee shall not discharge to the atmosphere PM in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas; and 0.050 gr/dscf of effluent gas corrected to 3% oxygen by volume for liquid fuel.

[IDAPA 58.01.01.677, 5/1/94]

Sulfur Content

- 2.14 The permittee shall not sell, distribute, use, or make available for use any distillate fuel oil containing more than the following percentages of sulfur:

- ASTM Grade 1 fuel oil - 0.3% by weight.
- ASTM Grade 2 fuel oil - 0.5% by weight.

[IDAPA 58.01.01.728, 5/1/94]

- 2.14.1 The permittee shall not sell, distribute, use, or make available for use any residual fuel oil containing more than one and three-fourths percentage (1.75%) sulfur by weight.

[IDAPA 58.01.01.727, 5/1/94]

- 2.14.2 The permittee shall maintain documentation of supplier verification of distillate and residual fuel oil sulfur content on an as-received basis.

[IDAPA 58.01.01.322.06, 5/1/94]

Open Burning

- 2.15 The permittee shall comply with the *Rules for Control of Open Burning*, IDAPA 58.01.01.600-616.

[IDAPA 58.01.01.600-617, 3/30/07]

Renovation/Demolition

- 2.16 The permittee shall comply with all applicable portions of 40 CFR 61, Subpart M when conducting any renovation or demolition activities at the facility.

[40 CFR 61, Subpart M]

Regulated Substances for Accidental Release Prevention

- 2.17 An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, shall comply with the requirements of the Chemical Accident Prevention Provisions at 40 CFR 68 no later than the latest of the following dates:
- Three years after the date on which a regulated substance present above a threshold quantity is first listed under 40 CFR 68.130.

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-060315		
Permittee:	Basic American Foods	Facility ID No. 011-00012
Location:	Blackfoot, Idaho	

- The date on which a regulated substance is first present above a threshold quantity in a process.
[40 CFR 68.10 (a)]

Recycling and Emissions Reductions

- 2.18 The permittee shall comply with applicable standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, Recycling and Emissions Reduction.
[40 CFR 82, Subpart F]

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-060315		
Permittee:	Basic American Foods	Facility ID No. 011-00012
Location:	Blackfoot, Idaho	

3. BOILER 1, BOILER 2, AND BOILER 3

Summary Description

Table 3.1 describes the devices used to control emissions from Boiler 1, Boiler 2, and Boiler 3.

Table 3.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emissions Unit(s) / Process(es)	Emissions Control Device
Boiler 1	<u>Wet Scrubber</u> Manufacturer: Carbo-Tech Environmental Group, Inc. Model: 48x48-96HE Venturi type wet scrubber system used whenever Boilers 1 or 2 are combusting fuel oil. Monitoring: SO ₂ emissions continuously monitored SO ₂ Monitor: Sick Maihak in-situ SO ₂ gas analyzer and FLOWSIC volume flow measuring unit
Boiler 2	<u>Wet Scrubber</u> Manufacturer: Carbo-Tech Environmental Group, Inc. Model: 48x48-96HE Venturi type wet scrubber system used whenever Boilers 1 or 2 are combusting fuel oil. Monitoring: SO ₂ emissions continuously monitored SO ₂ Monitor: Sick Maihak in-situ SO ₂ gas analyzer and FLOWSIC volume flow measuring unit
Boiler 3	None

Table 3.2 contains only a summary of the requirements that apply to Boiler 1, Boiler 2, and Boiler 3. Specific permit requirements are listed below Table 3.2.

Table 3.2 APPLICABLE REQUIREMENTS SUMMARY FOR BOILERS 1, 2 & 3

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Operating and Monitoring and Recordkeeping Requirements
3.1, 3.1.1	PM ₁₀ , SO ₂ , NO _x , and CO	See Table 3.3, below; and NO _x < 96.6 lb/1000 gal of No.6 oil	PTC No. P-050301	3.9-3.16, 3.23, 3.26, 3.28-3.31, 3.34, 3.35
3.2, 3.4	SO ₂	0.50 lb per MMBtu Heat Input, or Sulfur Content not greater than 0.5 weight percent	40 CFR 60.42c(d)	3.17-3.19, 3.21, 3.27, 3.32, 3.33
3.3, 3.4	Visible Emissions (Opacity)	Opacity not greater than 20% (six-minute average) except one six-minute period per hour not more than 27%	40 CFR 60.43c(c)	3.17, 3.18, 3.20, 3.22, 3.32, 3.33
3.5	Visible Emissions (Opacity)	Opacity not greater than 20% for a period(s) aggregating more than three minutes in any 60 minute period	IDAPA 58.01.01.625	3.14, 3.16, 3.23-3.25, 3.28, 3.31, 3.34, 3.35

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-060315

Permittee:	Basic American Foods	Facility ID No. 011-00012
Location:	Blackfoot, Idaho	

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Operating and Monitoring and Recordkeeping Requirements
3.6	Nickel	240 lb/year	PTC No. P-050301	3.11, 3.13-3.15, 3.29, 3.31
3.7	PM	0.015 gr/dscf corrected to 3% oxygen for natural gas; 0.050 gr/dscf corrected to 8% oxygen for fuel oil	IDAPA 58.01.01.676	3.14, 3.16, 3.24, 3.25, 3.28, 3.31, 3.35
3.8	NO _x ; Boilers 1, 2, and 3	198 tons/year	PTC No. P-050301	3.11, 3.12, 3.16, 3.26, 3.28, 3.29, 3.35

Permit Limits / Standard Summary

3.1 PM₁₀, SO₂, NO_x, and CO Emissions - Boilers 1, 2, and 3

Emissions of particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM₁₀), sulfur dioxide (SO₂), oxides of nitrogen (NO_x), and carbon monoxide (CO) from the exhaust stacks of Boilers 1, 2, and 3 shall not exceed the values listed in Table 3.3.

Table 3.3 BOILER CRITERIA EMISSION LIMITS^A - HOURLY (LB/HR) AND ANNUAL^{B, C} (T/YR)

Source Description	PM ₁₀		SO ₂		NO _x		CO	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Boiler 1	---	---	---	---	---	---	4.6	---
Boiler 2	---	---	---	---	---	---	6.1	---
Boiler 3	0.30	---	1.9	---	5.4	---	1.8	---
Combined Emissions from Boilers 1 and 2	5.7	---	45.3	---	61.9	---	---	---
Combined Emissions from Boilers 1, 2 and 3	---	18.3	---	145	---	198	---	46

^A As determined by a pollutant specific U.S. EPA reference method, or DEQ approved alternative, or as determined by DEQ's emission estimation methods used in this permit analysis.

^B As determined by multiplying the actual or allowable (if actual is not available) pound per hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

^C T/yr is tons of emissions per any consecutive 12-month period

[PTC No. P-050301, 9/16/05]

3.1.1 NO_x Emissions - Boilers 1 and 2

Emissions of NO_x from the exhaust stacks of Boilers 1 and 2 shall each not exceed 96.64 pounds per 1000 gallons when No.6 oil is combusted.

[PTC No. P-050301, 9/16/05]

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-060315		
Permittee:	Basic American Foods	Facility ID No. 011-00012
Location:	Blackfoot, Idaho	

3.1.2 PM Emissions - Boiler 2

No owner or operator of an affected facility that commences construction, reconstruction, or modification after February 28, 2005, and that combusts coal, oil, wood, a mixture of these fuels, or a mixture of these fuels with any other fuels and has a heat input capacity of 8.7 MW (30 MMBtu/hr) or greater shall cause to be discharged into the atmosphere from that affected facility any gases that contain PM in excess of 0.030 lb/MMBtu heat input.

[40 CFR 60.43c(e)(1)]

3.2 Sulfur Dioxide Emissions - Boiler 2 - NSPS

In accordance with 40 CFR 60.42c(d), on and after the date on which the initial performance test is completed or required to be completed under 40 CFR 60.8, whichever date comes first, when oil is combusted in Boiler 2 BAF shall not cause to be discharged into the atmosphere from Boiler 2 any gases that contain SO₂ in excess of 215 ng/J (0.50 lb/million Btu) heat input; or, as an alternative, when oil is combusted in Boiler 2 BAF shall not combust oil in Boiler 2 that contains greater than 0.5 weight percent sulfur.

3.2.1 In accordance with 40 CFR 60.42c(g), compliance with the fuel oil sulfur limits and emission limits of this section shall be determined on a 30-day rolling average basis.

3.2.2 In accordance with 40 CFR 60.42c(i), the SO₂ emission limits and fuel oil sulfur limits under this section apply at all times, including periods of startup, shutdown, and malfunction.

3.2.3 In accordance with 40 CFR 60.42c(j), only the heat input supplied to Boiler 2 from the combustion of oil is counted under this section. No credit is provided for the heat input to Boiler 2 from other fuels or for heat derived from exhaust gases from other sources, such as internal combustion engines and kilns.

[40 CFR 60.42c; PTC No. P-050301, 9/16/05]

3.3 Visible Emissions - Boiler 2 - NSPS

On and after the date on which the initial performance test is completed or required to be completed under 40 CFR 60.8, whichever date comes first, BAF shall not cause to be discharged into the atmosphere from Boiler 2 any gases that exhibit greater than 20% opacity (six-minute average), except for one six-minute period (average) per hour of not more than 27% opacity in accordance with 40 CFR 60.43c(c).

3.3.1 The opacity standard under 40 CFR 60.43c(c) applies at all times, except during periods of startup, shutdown, or malfunction in accordance with 40 CFR 60.43c(d).

[40 CFR 60.43c; PTC No. P-050301, 9/16/05]

3.4 SO₂ and Visible Emissions with Merged Exhaust - Boiler 1

When the exhausts from Boiler 1 and 2 are merged ahead of a single scrubber to comply with Permit Condition 3.13, the exhaust from Boiler 1 shall be subject to the same emissions limits set forth for Boiler 2 in Permit Conditions 3.2 and 3.3, and BAF may install applicable continuous monitoring systems on each effluent or the combined effluent from Boilers 1 and 2 in accordance with 40 CFR 60.13(g).

[40 CFR 60.13(g); PTC No. P-050301, 9/16/05]

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-060315		
Permittee:	Basic American Foods	Facility ID No. 011-00012
Location:	Blackfoot, Idaho	

3.5 Visible Emissions - Boilers 1, 2, and 3

In accordance with IDAPA 58.01.01.625, the permittee shall not discharge any air pollutant to the atmosphere from any boiler exhaust stack for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625.

[IDAPA 58.01.01.625, 4/5/00; PTC No. P-050301, 9/16/05]

3.6 Nickel Emissions - Boilers 1 and 2

Combined emissions of nickel from the exhaust stacks of Boilers 1 and 2 shall not exceed 240 pounds per any consecutive 12-month period.

[IDAPA 58.01.01.210.08, 6/30/95; PTC No. P-050301, 9/16/05]

3.7 Fuel Burning Equipment - PM Emissions

The permittee shall not discharge to the atmosphere from any boiler PM in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas fuel and 0.050 gr/dscf of effluent gas corrected to 3% oxygen by volume for liquid fuel in accordance with IDAPA 58.01.01.676-677.

[IDAPA 58.01.01.676, 5/1/94; PTC No. P-050301, 9/16/05]

3.8 NO_x Emissions - Boilers 1, 2, and 3

The combined emissions of NO_x from Boiler 1, Boiler 2, and Boiler 3 shall not exceed 198 tons per any consecutive 12-month period.

[PTC No. P-050301, 9/16/05]

Operating Requirements

3.9 Fuel Specifications – Boilers 1, 2, and 3

3.9.1 Boilers 1 and 2 may burn natural gas, distillate oil, or residual oil. Boiler 3 may burn natural gas fuel as primary fuel and low sulfur distillate oil as secondary fuel.

3.9.2 The sulfur content of fuels burned in the boilers shall not exceed the following amounts:

- Distillate oil burned in Boiler 3 shall not exceed 0.05% sulfur by weight;
- Distillate oil burned in Boiler 1 and Boiler 2 shall not exceed 0.5% sulfur by weight in accordance with IDAPA 58.01.01.728, and;
- Residual oil burned in Boiler 1 and Boiler 2 shall not exceed 1.75% sulfur by weight in accordance with IDAPA 58.01.01.727.

[IDAPA 58.01.01.727-728, 5/1/94; PTC No. P-050301, 9/16/05]

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-060315		
Permittee:	Basic American Foods	Facility ID No. 011-00012
Location:	Blackfoot, Idaho	

3.10 Annual Operating Schedule – Boiler 3

- The quantity of natural gas combusted in Boiler 3 shall not exceed 328 million standard cubic feet (MMscf) per year, based on any consecutive 12-month period.
- The quantity of distillate oil combusted in Boiler 3 shall not exceed 393,120 gallons per year, based on any consecutive 12-month period.

[PTC No. P-050301, 9/16/05]

3.11 Residual Oil Throughput – Boilers 1 and 2

The combined quantity of residual oil combusted in Boiler 1 and Boiler 2 shall not exceed 15,384 gallons per day and 4,097,682 gallons per year, based on any consecutive 12-month period.

[PTC No. P-050301, 9/16/05]

3.12 Simultaneous Boiler Operation – Boilers 1, 2, and 3

Whenever residual oil is combusted in Boiler 1 or Boiler 2, the combined quantity of steam produced by all three boilers shall not exceed 80,000 pounds per hour, based on a daily average.

[PTC No. P-050301, 9/16/05]

3.13 Wet Scrubbing System – Boilers 1 and 2

The permittee shall install, maintain and operate a wet scrubbing system to control emissions of SO₂ and PM₁₀ from Boiler 1 and Boiler 2 as follows:

- 3.13.1 Emissions of SO₂ and PM₁₀ from Boiler 1 shall be controlled using a wet scrubber when fuel oil is combusted. When Boiler 1 combusts natural gas, wet scrubbing of the Boiler 1 exhaust is not required.
- 3.13.2 Emissions of SO₂ and PM₁₀ from Boiler 2 shall be controlled using a wet scrubber when fuel oil is combusted. When Boiler 2 combusts natural gas, wet scrubbing of the Boiler 2 exhaust is not required.
- 3.13.3 When Boiler 1 combusts distillate or residual oil, Boiler 1 shall exhaust through the stack that serves the scrubber. When Boiler 1 combusts natural gas, Boiler 1 may exhaust through its own stack.
- 3.13.4 When Boiler 2 combusts distillate or residual oil, Boiler 2 shall exhaust through the stack that serves the scrubber. When Boiler 2 combusts natural gas, Boiler 2 may exhaust through its own stack.

[PTC No. P-050301, 9/16/05]

3.14 Wet Scrubber Operating Parameters – Boilers 1 and 2

The permittee shall install, calibrate, operate and maintain equipment to measure each of the following operating parameters for the wet scrubbing system. When the wet scrubbing system is required to be operated, each operating parameter shall be maintained within the specifications established in the O&M manual:

- Pressure drop across the scrubber, or DEQ-approved alternative monitoring, for ensuring dispersion and mixing of scrubbing solution with air;
- Scrubbing solution pH; and
- Scrubbing solution flow rate.

[PTC No. P-050301, 9/16/05]

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-060315		
Permittee:	Basic American Foods	Facility ID No. 011-00012
Location:	Blackfoot, Idaho	

3.15 O & M Manual – Wet Scrubbers

Within 60 days after startup of the wet scrubbing systems, the permittee shall have developed an O&M manual for the wet scrubbing system, which describes the procedures that will be followed to comply with the PTC General Provisions and the manufacturer specifications for the air pollution control device. At a minimum the following items shall be addressed in the manual:

- The manufacturer's recommended minimum and maximum values, or DEQ-approved alternatives, for each of the following operating parameters: pressure drop, for ensuring dispersion and mixing of the scrubbing solution with the air stream; the scrubbing solution pH; and the scrubbing solution flow rate.
- Inspection checklists for items that will be periodically inspected while the treatment system is operating, including frequency of inspection.
- Inspection checklist for items that will be inspected when the device is taken out of operation and physically opened for inspection (e.g., internal components), including frequency of these internal inspections.
- Periodic planned maintenance for the control devices.

The contents of the O&M manual shall be based on manufacturer's information to the extent practical. When the manufacturer's information is not used (e.g., a DEQ-approved alternative or performance test information is used in lieu of manufacturer information), this shall be explained in the manual. The O&M manual shall remain onsite at all times and shall be made available to DEQ representatives upon request.

[PTC No. P-050301, 9/16/05]

3.16 Annual Boiler Tune-up – Boilers 1, 2, and 3

The burners in each boiler shall be tuned annually to maintain efficient fuel combustion.

[PTC No. P-050301, 9/16/05]

3.17 Maintenance of Facilities and Air Pollution Control Equipment – Boiler 2 NSPS

At all times, including periods of startup, shutdown, and malfunction, BAF shall, to the extent practicable, maintain and operate Boiler 2 including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions in accordance with 40 CFR 60.11(d).

[40 CFR 60.11(d); PTC No. P-050301, 9/16/05]

Monitoring and Recordkeeping Requirements

3.18 General Performance Testing – Boiler 2 - NSPS

Performance testing conducted for Boiler 2 under 40 CFR Part 60 Subpart Dc shall be performed in accordance with 40 CFR 60 Subpart A, including but not limited to the following requirements under 40 CFR 60.8 and 60.11.

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-060315

Permittee: Basic American Foods

Location: Blackfoot, Idaho

Facility ID No. 011-00012

- 3.18.1 Within 60 days after achieving the maximum production rate at which Boiler 2 facility will be operated, but not later than 180 days after initial startup of such facility and at such other times as may be required by the EPA Administrator under section 114 of the Act, the owner or operator of such facility shall conduct performance test(s) and furnish the EPA Administrator a written report of the results of such performance test(s) in accordance with 40 CFR 60.8(a).
- 3.18.2 For the purpose of demonstrating initial compliance, opacity observations shall be conducted concurrently with the initial performance test required in 40 CFR 60.8 except as otherwise provided in 40 CFR 60.11(e)(1).
- 3.18.3 Performance tests shall be conducted and data reduced in accordance with the test methods and procedures contained in 40 CFR 60 Subpart Dc unless the EPA Administrator provides otherwise in accordance with 40 CFR 60.8(b).
- 3.18.4 Performance tests shall be conducted under such conditions as the EPA Administrator shall specify to the plant operator based on representative performance of the affected facility. The owner or operator shall make available to the EPA Administrator such records as may be necessary to determine the conditions of the performance tests. Operations during periods of startup, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test nor shall emissions in excess of the level of the applicable emission limit during periods of startup, shutdown, and malfunction be considered a violation of the applicable emission limit unless otherwise specified in the applicable standard in accordance with 40 CFR 60.8(c).

[40 CFR 60.8, 60.11; PTC No. P-050301, 9/16/05]

3.19 Compliance and Performance Test Methods and Procedures for SO₂ – Boiler 2 - NSPS

- 3.19.1 Except as provided in paragraphs 40 CFR 60.44c(g) and (h) and in 60.8(b), performance tests required under 40 CFR 60.8 shall be conducted following the procedures specified in 40 CFR 60.44c(b), (c), (d), and (e), as applicable. Section 60.8(f) does not apply to this section. The 30-day notice required in 40 CFR 60.8(d) applies only to the initial performance test unless otherwise specified by the EPA Administrator in accordance with 40 CFR 60.44c(a).
- 3.19.2 The initial performance test required under 40 CFR 60.8 shall be conducted over 30 consecutive operating days of the steam generating unit. Compliance with the SO₂ emission limits under 40 CFR 60.42c shall be determined using a 30-day average. The first operating day included in the initial performance test shall be scheduled within 30 days after achieving the maximum production rate at which Boiler 2 will be operated, but not later than 180 days after the initial startup of the Boiler 2. The steam generating unit load during the 30-day period does not have to be the maximum design heat input capacity, but must be representative of future operating conditions in accordance with 40 CFR 60.44c(b).
- 3.19.3 After the initial performance test required under paragraph 40 CFR 60.44c(b) and 60.8, compliance with the SO₂ emission limits under 40 CFR 60.42c is based on the average SO₂ emission rates for 30 consecutive steam generating unit operating days. A separate performance test is completed at the end of each steam generating unit operating day, and a new 30-day average SO₂ emission rate is calculated to show compliance with the standard in accordance with 40 CFR 60.44c(c).

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-060315

Permittee:	Basic American Foods	Facility ID No. 011-00012
Location:	Blackfoot, Idaho	

- 3.19.4 If only oil is combusted in Boiler 2, the procedures in Method 19 are used to determine the hourly SO₂ emission rate (E_{ho}) and the 30-day average SO₂ emission rate (E_{ao}). The hourly averages used to compute the 30-day averages are obtained from the continuous emission monitoring system (CEMS). Method 19 shall be used to calculate E_{ao} when using daily fuel sampling or Method 6B in accordance with 40 CFR 60.44c(d).
- 3.19.5 In accordance with 40 CFR 60.44c(g), for oil-fired affected facilities where the owner or operator seeks to demonstrate compliance with the fuel oil sulfur limits under 40 CFR 60.42c based on shipment fuel sampling, the initial performance test shall consist of sampling and analyzing the oil in the initial tank of oil to be fired in the steam generating unit to demonstrate that the oil contains 0.5 weight percent sulfur or less. Thereafter, the owner or operator of the affected facility shall sample the oil in the fuel tank after each new shipment of oil is received, as described under 40 CFR 60.46c(d)(2).
- 3.19.6 In accordance with 40 CFR 60.44c(j), the owner or operator of an affected facility shall use all valid SO₂ emissions data in calculating E_{ho} under 40 CFR 60.44c(d) or (e), as applicable, whether or not the minimum emissions data requirements under 40 CFR 60.46c(f) are achieved. All valid emissions data, including valid data collected during periods of startup, shutdown, and malfunction, shall be used in calculating E_{ho} pursuant to 40 CFR 60.44c(d) or (e), as applicable.
[40 CFR 60.44c; PTC No. P-050301, 9/16/05]
- 3.20 Monitoring, Compliance and Performance Test Methods and Procedures for PM – Boiler 2 - NSPS
- 3.20.1 In accordance with 40 CFR 60.45c(a), the owner or operator of an affected facility subject to the opacity standards under 40 CFR 60.43c shall conduct an initial performance test as required under 40 CFR 60.8, and shall conduct subsequent performance tests as requested by the EPA Administrator, to determine compliance with the standards using the following procedures and reference methods:
- Method 9 (six-minute average of 24 observations) shall be used for determining the opacity of stack emissions in accordance with 40 CFR 60.45c(a)(8).
- 3.20.2 In accordance with 40 CFR 60.47c(a), the owner or operator of an affected facility combusting residual oil that is subject to the opacity standards under 40 CFR 60.43c shall install, calibrate, maintain, and operate a COMS for measuring the opacity of the emissions discharged to the atmosphere and record the output of the system.
- 3.20.3 In accordance with 40 CFR 60.47c(b), all COMS for measuring opacity shall be operated in accordance with the applicable procedures under Performance Specification 1 (40 CFR Part 60 Appendix B). The span value of the opacity COMS shall be between 60 and 80%.
- 3.20.4 The permittee shall conduct an initial particulate performance test as required under §60.8, and shall conduct subsequent performance tests as requested by the Administrator, to determine compliance with the standards using the procedures and reference methods in 40 CFR 60.45c(a).
[40 CFR 60.45c, 60.47c; PTC No. P-050301, 9/16/05]
- 3.21 Emission Monitoring for SO₂ Emissions – Boiler 2 - NSPS
- 3.21.1 In accordance with 40 CFR 60.46c(a), except as provided in 40 CFR 60.46c(d) and (e), the owner or operator of an affected facility subject to the SO₂ emission limits under 40 CFR 60.42c shall install, calibrate, maintain, and operate a CEMS for measuring SO₂ concentrations and either oxygen or carbon

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-060315

Permittee: Basic American Foods

Location: Blackfoot, Idaho

Facility ID No. 011-00012

dioxide concentrations at the outlet of the SO₂ control device (or the outlet of the steam generating unit if no SO₂ control device is used), and shall record the output of the system. The percent reduction requirements under 40 CFR 60.42c do not apply and BAF is not required to measure SO₂ concentrations and either oxygen or carbon dioxide concentrations at both the inlet and outlet of the SO₂ control device.

- 3.21.2 In accordance with 40 CFR 60.46c(b), the one-hour average SO₂ emission rates measured by a CEMS shall be expressed in ng/J or lb/million Btu heat input and shall be used to calculate the average emission rates under 40 CFR 60.42c. Each one-hour average SO₂ emission rate must be based on at least 30 minutes of operation and include at least two data points representing two 15-minute periods. Hourly SO₂ emission rates are not calculated if the affected facility is operated less than 30 minutes in an one-hour period and are not counted toward determination of a steam generating unit operating day.
- 3.21.3 In accordance with 40 CFR 60.46c(c), the procedures under 40 CFR 60.13 shall be followed for installation, evaluation, and operation of the CEMS.
- (1) All CEMS shall be operated in accordance with the applicable procedures under Performance Specifications 1, 2, and 3 (40 CFR Part 60 Appendix B).
 - (2) Quarterly accuracy determinations and daily calibration drift tests shall be performed in accordance with Procedure 1 (40 CFR Part 60 Appendix F).
 - (3) 40 CFR 60.46c(c)(3) does not apply
 - (4) The span value of the SO₂ CEMS at the outlet from the SO₂ control device (or outlet of the steam generating unit if no SO₂ control device is used) shall be 125% of the maximum estimated hourly potential SO₂ emission rate of the fuel combusted.
- 3.21.4 As an alternative to operating an SO₂ CEMS, fuel sampling may be conducted in accordance with 40 CFR 60.46c(d).
- 3.21.5 In accordance with 40 CFR 60.46c(f), the owner or operator of an affected facility operating a CEMS pursuant to 40 CFR 60.46c(a), or conducting as-fired fuel sampling pursuant to 40 CFR 60.46c(d)(1), shall obtain emission data for at least 75% of the operating hours in at least 22 out of 30 successive steam generating unit operating days. If this minimum data requirement is not met with a single monitoring system, the owner or operator of the affected facility shall supplement the emission data with data collected with other monitoring systems as approved by the EPA Administrator.

[40 CFR 60.46c; PTC No. P-050301, 9/16/05]

3.22 Alternative Opacity and SO₂ Monitoring Procedures – Boiler 2 - NSPS

After receipt and consideration of a written application, the EPA Administrator may approve alternatives to any monitoring procedures or requirements of 40 CFR Part 60 in accordance with 40 CFR 60.13(i). EPA approved an alternative opacity monitoring plan on September 29, 2005. The plan is provided as Attachment A to this permit, and provisions of the alternate opacity monitoring plan replace permit provisions requiring a COMS.

[40 CFR 60.13; PTC No. P-050301, 9/16/05]

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-060315		
Permittee:	Basic American Foods	Facility ID No. 011-00012
Location:	Blackfoot, Idaho	

3.23 Opacity and SO₂ Monitoring – Boilers 1 and 2

3.23.1 Whenever oil is combusted in Boiler 1, opacity from the Boiler 1 stack shall be monitored by complying with the opacity requirements described in the 40 CFR Part 60 (NSPS) requirements for Boiler 2 as described in Section 3 of this permit, or complying with the alternative opacity monitoring procedure identified in Permit Condition 3.22 and Attachment A.

3.23.2 Whenever oil is combusted in Boiler 1 or Boiler 2, SO₂ emissions from the Boiler(s) shall be monitored by complying with the SO₂ CEMS or fuel sampling requirements as described in the 40 CFR Part 60 (NSPS) requirements for Boiler 2, as described in Section 3 of this permit, for purposes of complying with the Compliance Assurance Monitoring (CAM) exemption requirements under 40 CFR 64.2(b)(1)(vi). Maintaining records of fuel receipts for fuel oil may not be used for this purpose.

[40 CFR 64.2; PTC No. P-050301, 9/16/05]

3.24 PM Performance Test – Boiler 1 and Boiler 2

At least once every five years a PM performance test shall be conducted on the stack of Boiler 1 and Boiler 2, when firing No. 6 fuel oil, to demonstrate compliance with the PM emission limit in Permit Condition 3.7. Each boiler shall be tested while operating alone and each may be tested on a different date so long as each boiler is tested no less than once every five years. The test shall be conducted in accordance with the procedures outlined in 40 CFR 60, Appendix A, Method 5, or a DEQ-approved alternative. The performance test shall be performed in accordance with IDAPA 58.01.01.157 and the following requirements:

- The boiler shall be operated at the worst case normal production rate during the performance test. A description of how this requirement was met shall be included in the performance test report.
- Visible emissions shall be observed during each performance test run using the methods specified in IDAPA 58.01.01.625.
- The quantity of fuel oil combusted by the boiler during the test shall be recorded in units of gallons per hour.

[IDAPA 58.01.01.157, 4/5/00; PTC No. P-050301, 9/16/05]

3.25 Initial PM Performance Test – Boiler 2

Within 60 days of achieving the maximum production rate of Boiler 2 when firing No. 6 fuel oil, but not later than 180 days after issuance of this permit, an initial performance test shall be conducted to measure PM emissions from the stack of Boiler 2, when firing No. 6 fuel oil, to demonstrate compliance with the PM emission limit in Permit Condition 3.7. The test shall be conducted in accordance with the procedures specified in Permit Condition 3.24

[IDAPA 58.01.01.157, 4/5/00; PTC No. P-050301, 9/16/05]

3.26 NO_x Performance Test – Boilers 1 and 2

Within 60 days of achieving the maximum production rate of Boiler 1 and Boiler 2 when firing No. 6 fuel oil, but not later than 180 days after issuance of this permit, and at least once every five years thereafter, performance tests shall be conducted to measure NO_x emissions from the stacks of Boiler 1 and Boiler 2, when firing No. 6 fuel oil, to demonstrate compliance with the pound per hour NO_x emission limits in Permit Condition 3.1. Each boiler shall be tested while operating alone and each may be tested on a different date so long as each boiler is tested no less than once every five years. The tests

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-060315		
Permittee:	Basic American Foods	Facility ID No. 011-00012
Location:	Blackfoot, Idaho	

shall be conducted in accordance with the procedures outlined in 40 CFR 60, Appendix A, Method 7E, or a DEQ-approved alternative. Each performance test shall be performed in accordance with IDAPA 58.01.01.157 and the following requirements:

- The boiler shall be operated at the worst case normal production rate during the performance test. A description of how this requirement was met shall be included in the performance test report.
- Visible emissions shall be observed during each performance test run using the methods specified in IDAPA 58.01.01.625.
- The quantity of fuel oil combusted by the boiler during the test shall be recorded in units of gallons per hour.

[IDAPA 58.01.01.157, 4/5/00; PTC No. P-050301, 9/16/05]

3.27 Record Keeping Requirements – Boiler 2 - NSPS

3.27.1 The owner or operator shall record and maintain records of the amounts of each fuel combusted during each day in accordance with 40 CFR 60.48c(g).

3.27.2 All records required under this section shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record in accordance with 40 CFR 60.48c(i).

[40 CFR 60.48c; PTC No. P-050301, 9/16/05]

3.28 Records of Boiler Tuning – Boilers 1, 2, and 3

Records shall be maintained of boiler tuning providing the date the tuning was conducted and a description of adjustments made to the burners to improve combustion efficiency.

[PTC No. P-050301, 9/16/05]

3.29 Monitoring of Boiler Operating Parameters

The following operating data shall be monitored and recorded for Boilers 1, 2, and 3:

3.29.1 On a monthly basis, record the quantity of natural gas combusted in Boiler 3 in units of MMscf per month and MMscf per consecutive 12-month period. The annual fuel consumption shall be determined by summing the most recent monthly quantity and the monthly quantities over the previous consecutive 11-month period.

3.29.2 On a monthly basis, record the quantity of distillate oil combusted in Boiler 3 in units of gallons per month and gallons per consecutive 12-month period.

3.29.3 On a monthly basis, record the combined quantity of residual oil combusted in Boiler 1 and Boiler 2 in units of gallons per month and gallons per consecutive 12-month period.

3.29.4 On a daily basis, record the date and the combined quantity of residual oil combusted that day in Boiler 1 and Boiler 2.

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-060315		
Permittee:	Basic American Foods	Facility ID No. 011-00012
Location:	Blackfoot, Idaho	

- 3.29.5 Each day that residual oil is combusted in Boiler 1 or Boiler 2, record the following: date; total combined pounds of steam produced that day by all three boilers; and the combined average quantity of steam produced by all three boilers in units of pounds per hour, based on a daily average.

[PTC No. P-050301, 9/16/05]

3.30 Fuel Sulfur Content Receipts – Boilers 1, 2, and 3

For each shipment of fuel oil received, the permittee shall obtain and maintain at the facility fuel receipts from the fuel supplier which demonstrate the oil received complies with the fuel sulfur content limits specified in Permit Condition 3.9.2 and IDAPA 58.01.01.725-728.

[IDAPA 58.01.01.727-728, 5/1/94; PTC No. P-050301, 9/16/05]

3.31 Wet Scrubber Operating Parameters – Boilers 1 and 2

The pressure drop, scrubbing solution pH and scrubbing solution flow rate shall be monitored and recorded once each week when the wet scrubbing system is required to be operated. Monitoring records shall be maintained onsite for a period of five years and made available to DEQ representatives upon request.

[PTC No. P-050301, 9/16/05]

3.32 40 CFR Part 60 Subpart A General Provisions – Boiler 2 - NSPS

The permittee shall comply with the requirements of 40 CFR 60 Subpart A for Boiler 2 including, but not limited to, notification of commencement of construction within 30 days of commencement and notification of actual date of startup postmarked within 15 days of that date.

[40 CFR 60 Subpart A; PTC No. P-050301, 9/16/05]

Reporting Requirements

3.33 Notifications and Reporting Requirements – Boiler 2 - NSPS

- 3.33.1 In accordance with 40 CFR 60.48c(a), BAF shall submit notification of the date of construction or reconstruction, anticipated startup, and actual startup, as provided by 40 CFR 60.7. This notification shall include:

- (1) The design heat input capacity of Boiler 2 and identification of fuels to be combusted in Boiler 2.
- (2) If applicable, a copy of any Federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels under 40 CFR 60.42c or 60.43c.
- (3) The annual capacity factor at which the owner or operator anticipates operating Boiler 2 based on all fuels fired and based on each individual fuel fired.
- (4) Notification if an emerging technology will be used for controlling SO₂ emissions as described in 40 CFR 60.48c(a)(4).

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-060315

Permittee: Basic American Foods

Location: Blackfoot, Idaho

Facility ID No. 011-00012

- 3.33.2 In accordance with 40 CFR 60.48c(b), the owner or operator of each affected facility subject to the SO₂ emission limits of 40 CFR 60.42c, or the opacity limits of 40 CFR 60.43c, shall submit to the EPA Administrator the performance test data from the initial and any subsequent performance tests and, if applicable, the performance evaluation of the CEMS and/or COMS using the applicable performance specifications in 40 CFR 60 Appendix B.
- 3.33.3 In accordance with 40 CFR 60.48c(c), the owner or operator of each residual oil-fired affected facility subject to the opacity limits under 40 CFR 60.43c(c) shall submit excess emission reports for any excess emissions from the affected facility which occur during the reporting period.
- 3.33.4 In accordance with 40 CFR 60.48c(d), the owner or operator of each affected facility subject to the SO₂ emission limits or fuel oil sulfur limits under 40 CFR 60.42c shall submit reports to the EPA Administrator.
- 3.33.5 In accordance with 40 CFR 60.48c(e), the owner or operator of each affected facility subject to the SO₂ emission limits or fuel oil sulfur limits under 40 CFR 60.42c shall keep records and submit reports as required under 40 CFR 60.48c(d), including the following information, as applicable:
- (1) Calendar dates covered in the reporting period.
 - (2) Each 30-day average SO₂ emission rate (ng/J or lb/million Btu), or 30-day average sulfur content (weight percent), calculated during the reporting period, ending with the last 30-day period; reasons for any noncompliance with the emission standards; and a description of corrective actions taken.
 - (3) 40 CFR 60.48c(e)(3) does not apply
 - (4) Identification of any steam generating unit operating days for which SO₂ or diluent (oxygen or carbon dioxide) data have not been obtained by an approved method for at least 75% of the operating hours; justification for not obtaining sufficient data; and a description of corrective actions taken.
 - (5) Identification of any times when emissions data have been excluded from the calculation of average emission rates; justification for excluding data; and a description of corrective actions taken if data have been excluded for periods other than those during which oil was not combusted in the steam generating unit.
 - (6) Identification of the F factor used in calculations, method of determination, and type of fuel combusted.
 - (7) Identification of whether averages have been obtained based on CEMS rather than manual sampling methods.
 - (8) If a CEMS is used, identification of any times when the pollutant concentration exceeded the full span of the CEMS.
 - (9) If a CEMS is used, description of any modifications to the CEMS that could affect the ability of the CEMS to comply with Performance Specifications 2 or 3 (40 CFR 60 Appendix B).
 - (10) If a CEMS is used, results of daily CEMS drift tests and quarterly accuracy assessments as required under 40 CFR 60 Appendix F, Procedure 1.

[40 CFR 60.48c; PTC No. P-050301, 9/16/05]

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-060315		
Permittee:	Basic American Foods	Facility ID No. 011-00012
Location:	Blackfoot, Idaho	

3.33.6 In accordance with 40 CFR 60.48c(j), the reporting period for the reports required under this subpart is each six-month period. All reports shall be submitted to the EPA Administrator and shall be postmarked by the 30th day following the end of the reporting period.

3.34 Notifications and Reporting to DEQ – Boilers 1 and 2

A copy of all reports submitted to EPA for NSPS requirements shall also be submitted to DEQ.

[PTC No. P-050301, 9/16/05]

3.35 Performance Test Reports DEQ – Boilers 1 and 2

Each performance test report, including the required process data, shall be submitted to DEQ within 60 days of the date on which the performance test is conducted.

[PTC No. P-050301, 9/16/05]

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-060315		
Permittee:	Basic American Foods	Facility ID No. 011-00012
Location:	Blackfoot, Idaho	

4. PROCESS A

Summary Description

The following is a narrative description of Process A regulated in this Tier I operating permit. This description is for informational purposes only.

Process A produces dehydrated potato products. The raw materials put into the process are cooked potatoes and food additives, including sulfites. Process A can operate up to 8,760 hr/yr. There are no alternate operating scenarios.

Emissions units included in Process A include process vents from process equipment. All emissions units associated with this process are potential sources of particulate matter. The drying unit processes can potentially emit SO₂ from the decomposition of sulfites. Drying heat is provided by both natural gas combustion and steam produced by the plant's boilers.

This process was constructed in the early 1960s.

Table 4.1 describes the devices used to control emissions from Process A. DHQ, DHT, DHU, and DHZ are vents from Process A.

Table 4.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emissions Unit(s) / Process(es)	Emissions Control Device
Process A : DHQ – cooler DHT – dryer (7 MMBtu/hr natural gas-fired) DHU – dryer (7 MMBtu/hr natural gas-fired) DHZ – dryer (6 MMBtu/hr steam and natural gas-fired)	None

Table 4.2 contains only a summary of the requirements that apply to Process A. Specific permit requirements are listed below Table 4.2.

Table 4.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Operating and Monitoring and Recordkeeping Requirements
4.1	PM	Process weight	IDAPA 58.01.01.702	4.3
4.2	Visible Emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	2.8

Permit Limits / Standard Summary

- 4.1 The permittee shall not discharge to the atmosphere from any source operating prior to October 1, 1979, PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour.

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-060315		
Permittee:	Basic American Foods	Facility ID No. 011-00012
Location:	Blackfoot, Idaho	

- a. If PW is less than 17,000 lb/hr,
 $E = 0.045(PW)^{0.6}$
- b. If PW is equal to or greater than 17,000 lb/hr,
 $E = 1.12(PW)^{0.27}$

[IDAPA 58.01.01.702, 4/5/00]

- 4.1.1 The process weight PM limitation applies to the collection of emissions units/processes identified in Table 4.1. Demonstrating compliance with the visible emissions requirement contained in Permit Condition 4.3 inherently demonstrates compliance with the process weight PM emissions limitations.

[IDAPA 58.01.01.322.01, 3/19/99]

- 4.2 The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas are the only reason(s) for the failure of the emission to comply with the requirements of this section.

[IDAPA 58.01.01.625, 4/5/00]

Monitoring and Recordkeeping Requirements

- 4.3 To demonstrate compliance with Permit Condition 4.1, the permittee shall conduct a monthly one-minute observation of each affected emissions point, or source, using EPA Method 22 (in 40 CFR 60, Appendix A). If visible emissions in excess of 10% opacity are observed from any emissions point or source, a six-minute observation, using EPA Method 9, shall be conducted. The visible emissions evaluations shall be performed during daylight hours under normal operating conditions. The results of each evaluation shall be recorded and shall be maintained in accordance with Permit Condition 2.11.

[IDAPA 58.01.01.322.01, 3/19/99, IDAPA 58.01.01.322.06, 07, 5/1/94]

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-060315		
Permittee:	Basic American Foods	Facility ID No. 011-00012
Location:	Blackfoot, Idaho	

5. PROCESS B

Summary Description

The following is a narrative description of Process B regulated in this Tier I operating permit. This description is for informational purposes only.

Process B produces dehydrated potato products. The raw materials put into the process are cooked potatoes and food additives, including sulfites. Process B can operate up to 8,760 hr/yr. There are no alternate operating scenarios.

Emissions units included in Process B include process vents from process equipment. All emissions units associated with this process are potential sources of particulate matter. The drying unit processes can potentially emit SO₂ from the decomposition of sulfites. Drying heat is provided by both natural gas combustion and steam produced by the plant's boilers.

This process was constructed in the early 1960s.

Table 5.1 describes the devices used to control emissions from Process B. DUQ, DUT, DUV, DQA, and DQB are vents from Process B.

Table 5.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emissions Unit(s) / Process(es)	Emissions Control Device
Process B: DUQ – dryer (7 MMBtu/hr natural gas-fired) DUT – dryer (7 MMBtu/hr natural gas-fired) DUV – 2 dryers (6 MMBtu/hr each, steam and natural gas-fired) DQA – dryer (7 MMBtu/hr natural gas-fired) DQB – dryer (7 MMBtu/hr natural gas-fired)	None

Table 5.2 contains only a summary of the requirements that apply to Process B. Specific permit requirements are listed below Table 5.2.

Table 5.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Operating and Monitoring and Recordkeeping Requirements
5.1	PM	Process weight	IDAPA 58.01.01.702	5.3
5.2	Visible Emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	2.8

Permit Limits / Standard Summary

- 5.1 The permittee shall not discharge to the atmosphere from any source operating prior to October 1, 1979, PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour.

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-060315

Permittee: Basic American Foods

Location: Blackfoot, Idaho

Facility ID No. 011-00012

- a. If PW is less than 17,000 lb/hr,
 $E = 0.045(PW)^{0.6}$
- b. If PW is equal to or greater than 17,000 lb/hr,
 $E = 1.12(PW)^{0.27}$

[IDAPA 58.01.01.702, 4/5/00]

- 5.1.1 The process weight PM limitation applies to the collection of emissions units/processes identified in Table 5.1. Demonstrating compliance with the visible emissions requirement contained in Permit Condition 5.3 inherently demonstrates compliance with the process weight PM emissions limitations.
[IDAPA 58.01.01.322.01, 3/19/99]

- 5.2 The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas are the only reason(s) for the failure of the emission to comply with the requirements of this section.
[IDAPA 58.01.01.625, 4/5/00]

Monitoring and Recordkeeping Requirements

- 5.3 To demonstrate compliance with Permit Condition 5.1, the permittee shall conduct a monthly one-minute observation of each affected emissions point, or source, using EPA Method 22 (in 40 CFR 60, Appendix A). If visible emissions in excess of 10% opacity are observed from any emissions point, or source, a six-minute observation, using EPA Method 9, shall be conducted. The visible emissions evaluations shall be performed during daylight hours under normal operating conditions. The results of each evaluation shall be recorded and shall be maintained in accordance with Permit Condition 2.11.
[IDAPA 58.01.01.322.01, 3/19/99, IDAPA 58.01.01.322.06, 07, 5/1/94]

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-060315

Permittee:	Basic American Foods	Facility ID No. 011-00012
Location:	Blackfoot, Idaho	

6. PROCESS C

Summary Description

The following is a narrative description of Process C regulated in this Tier I operating permit. This description is for informational purposes only.

Process C produces dehydrated food products. The raw materials put into the process include raw and cooked foods, previously dehydrated foods, and food additives, including sulfites. Process C can operate up to 8,760 hr/yr. There are no alternate operating scenarios.

Emissions units included in Process C include process vents from process equipment. All emissions units associated with this process are potential sources of particulate matter. The process equipment can potentially emit SO₂ from the decomposition of sulfites. Drying heat is provided by steam produced by the plant's boilers and natural gas-fired heaters.

This process was installed and/or modified in 1966, 1971, 1982, & 1997.

Table 6.1 describes the devices used to control emissions from Process C.

Table 6.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emissions Unit(s) / Process(es)	Emissions Control Device
Process C: CIR – dryer (steam heated) CXX/CYY – dryer (6.05 MMBtu preheater, 4.4 MMBtu/hr front dryer, 6.6 MMBtu/hr rear dryer) CHX – dryer (10.3 MMBtu/hr steam and natural gas-fired with 2.9 MMBtu preheater) HEB – dryer (steam heated, with 6 MMBtu/hr natural gas preheater) CNV – dryer (12 MMBtu/hr natural gas-fired) CNW – dryer (12 MMBtu/hr natural gas-fired) CTU – dryer (steam heated)	None

Table 6.2 contains only a summary of the requirements that apply to Process C. Specific permit requirements are listed below Table 6.2.

Table 6.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Operating and Monitoring and Recordkeeping Requirements
6.1	PM	Process weight	IDAPA 58.01.01.702	6.3
6.2	Visible Emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	2.8

Permit Limits / Standard Summary

- 6.1 The permittee shall not discharge to the atmosphere from any source operating on or after October 1, 1979, particulate matter in excess of the amount shown by the following equations, where E is the

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-060315		
Permittee:	Basic American Foods	Facility ID No. 011-00012
Location:	Blackfoot, Idaho	

allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour:

- a. If PW is less than 9,250 lb/hr,

$$E = 0.045(PW)^{0.6}$$
- b. If PW is equal to or greater than 9,250 lb/hr,

$$E = 1.10(PW)^{0.25}$$

[IDAPA 58.01.01.701, 4/5/00]

- 6.1.1 The process weight PM limitation applies to the collection of emissions units/processes identified in Table 6.1. Demonstrating compliance with the visible emissions requirements contained in Permit Condition 6.3 inherently demonstrates compliance with the process weight PM emissions limitations.
[IDAPA 58.01.01.322.01, 3/19/99]

- 6.2 The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas are the only reason(s) for the failure of the emission to comply with the requirements of this section.
[IDAPA 58.01.01.625, 4/5/00]

Monitoring and Recordkeeping Requirements

- 6.3 To demonstrate compliance with Permit Condition 6.1, the permittee shall conduct a monthly one-minute observation of each affected emissions point, or source, using EPA Method 22 (in 40 CFR 60, Appendix A). If visible emissions in excess of 10% opacity are observed from any emissions point, or source, a six-minute observation, using EPA Method 9, shall be conducted. The visible emissions evaluations shall be performed during daylight hours under normal operating conditions. The results of each evaluation shall be recorded and shall be maintained in accordance with Permit Condition 2.11.
[IDAPA 58.01.01.322.01, 3/19/99, IDAPA 58.01.01.322.06, 07, 5/1/94]

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-060315

Permittee:	Basic American Foods	Facility ID No. 011-00012
Location:	Blackfoot, Idaho	

7. COMPLIANCE SCHEDULE

Basic American Foods is not in compliance at the time of issuance of the Tier I operating permit with the applicable PTC requirements for sources listed in Permit Condition 7.1. To bring the facility into compliance with the applicable requirements in the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01, et seq., the permittee shall obtain a combined facility-wide Tier II operating permit and PTC (hereafter referred to as the facility-wide permit) and a modified Tier I operating permit. The specific elements of the compliance schedule are summarized in Table 7.1 and specified in Permit Conditions 7.2 through 7.9.

TABLE 7.1. COMPLIANCE SCHEDULE

Permit Conditions	Milestone	Deadline	Documentation / Reporting
7.2	Permittee shall submit complete facility-wide permit application to comply with IDAPA 58.01.01.400 through 410	Within six months after issuance of original Tier I operating permit	Issuance of completeness letter from DEQ to permittee.
7.3	Concurrently submit complete application information to address the applicable PTC requirements in IDAPA 58.01.01.200 through 223 for those sources for which the permittee was required to, but did not obtain, a PTC	Within six months after issuance of Tier I operating permit	Issuance of completeness letter from DEQ to permittee
7.4	Submit supplemental application information to address the applicable PTC requirements for any additional sources identified	Within 30 days of a request in writing by DEQ during processing of the facility-wide permit.	Issuance of completeness letter from DEQ to permittee
7.7	Submit a request to modify the Tier I operating permit	30 days after the facility-wide permit application is found complete	Issuance of completeness letter from DEQ to permittee
7.8	Submit quarterly progress reports	January 1, April 1, July 1, and October 1 of each year	

- 7.1 DEQ and BAF have identified that portions of source Process C (including, but not limited to, P6 process dryer and P8 process dryer) are not in compliance because permits to construct were not obtained prior to construction or modification.

The permittee has the continuing responsibility to submit any supplementary information needed, including information for any other sources, in accordance with IDAPA 58.01.01.315.

- 7.2 The Basic American Foods Blackfoot facility shall submit a complete permit application and all additional information requested by DEQ for issuance of a facility-wide permit within 180 days of issuance of the initial Tier I operating permit. The application shall address the requirements for Tier II operating permits in accordance with IDAPA 58.01.01.400 through 410.

Complete. (The initial Tier I operating permit was issued December 11, 2002. Basic American Foods submitted a Tier II application on May 28, 2003, and DEQ issued a letter that determined the application complete on August 8, 2003.)

[IDAPA 58.01.01.322.10, 4/5/00]

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-060315		
Permittee:	Basic American Foods	Facility ID No. 011-00012
Location:	Blackfoot, Idaho	

- 7.3 In addition to the requirements for Tier II operating permits, the facility-wide permit application shall include all of the applicable information and address the applicable requirements for PTCs in accordance with IDAPA 58.01.01.200 through IDAPA 58.01.01.228 for the construction and/or modification of sources for which the permittee was required to, but did not obtain, a PTC. DEQ has identified the sources listed in Permit Condition 7.1 as sources that failed to obtain a permit prior to construction or modification.

Complete. (DEQ determined the application complete on August 8, 2003.)

[IDAPA 58.01.01.322.10, 4/5/00]

- 7.4 The permittee shall submit a supplemental application that addresses the applicable requirements for PTCs within 30 days of receiving written notification from DEQ if it is determined that the facility should have obtained a PTC or a PTC modification for any other sources or sources at the facility through the development of the facility-wide permit.

[IDAPA 58.01.01.322.10, 4/5/00]

- 7.5 The application submittal deadlines set forth in the compliance schedule may be extended if the permittee clearly demonstrates that additional time is needed to collect new data for submittal of a complete application. Extension requests, with complete information to justify the request, must be submitted in writing to DEQ no later than the end of the milestone timeline. The deadlines may be extended through written authorization from DEQ.

[IDAPA 58.01.01.322.10, 4/5/00]

- 7.6 DEQ will draft a single proposed facility-wide permit for the facility upon receipt of a complete application. The permit will contain all of the terms and conditions necessary to comply with the applicable requirements for PTCs in accordance with IDAPA 58.01.01.200 through 223 and the requirements for Tier II operating permits in accordance with IDAPA 58.01.01.400 through 410. The procedures for issuing a PTC under IDAPA 58.01.01.209 shall be followed concurrently with the procedures for issuing a Tier II operating permit under IDAPA 58.01.01.404.

[IDAPA 58.01.01.322.10, 4/5/00]

- 7.7 The Basic American Foods Blackfoot facility shall request a modification to their Tier I operating permit within 30 days after the combined facility-wide operating permit and PTC application is determined complete by DEQ. The Tier I operating permit shall be modified to incorporate all applicable requirements of the facility-wide permit and shall be issued concurrently with the facility-wide permit in accordance with the procedures for issuing a Tier I permit in IDAPA 58.01.01.360 through 369.

Complete. (Basic American Foods submitted a request to modify the Tier I operating permit in a letter dated September 24, 2003.)

[IDAPA 58.01.01.322.10, 4/5/00]

- 7.8 Until such time that a modified Tier I operating permit is issued, the Basic American Foods Blackfoot facility shall submit a progress report each calendar quarter to DEQ, stating when each of the milestones and compliance with each condition in the compliance schedule were or will be achieved, an explanation of why any dates were not or will not be met, and a detailed description of any preventative or corrective measures undertaken by the permittee.

[IDAPA 58.01.01.322.10, 4/5/00]

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-060315		
Permittee:	Basic American Foods	Facility ID No. 011-00012
Location:	Blackfoot, Idaho	

7.9

This schedule of compliance shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based.

[IDAPA 58.01.01.322.10, 4/5/00]

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-060315

Permittee:	Basic American Foods	Facility ID No. 011-00012
Location:	Blackfoot, Idaho	

8. INSIGNIFICANT ACTIVITIES

Activities and emission units identified as insignificant under IDAPA 58.01.01.317.01(b) are listed in the Tier I operating permit to qualify for a permit shield.

Table 8.1 INSIGNIFICANT ACTIVITIES

Description	Insignificant Activities IDAPA 58.01.01.317.01(b)(I) Citation
Operation, loading, and unloading of storage tanks and storage vessels, with lids or other appropriate closures and less than 260-gallon capacity, heated only to the minimum extent necessary to avoid solidification.	IDAPA 58.01.01.317.01.B(1)
Operation, loading and unloading of storage tanks not greater than 1,100-gallon capacity with lids, not containing hazardous air pollutants and with maximum vapor pressure of 550 mmHg.	IDAPA 58.01.01.317.01.B(2)
Operation, loading and unloading of volatile organic compound storage tanks, 10,000-gallon capacity or less, with lids or other appropriate closure and vapor pressure not greater than 80 mmHg at 21°C.	IDAPA 58.01.01.317.01.B(3)
Operation, loading, unloading, and storage of butane, propane, or liquefied petroleum gas (LPG) in storage tanks or vessels less than 40,000-gallon capacity.	IDAPA 58.01.01.317.01.B(4)
Combustion sources, less than five MMBtu/hr, use exclusively natural gas, butane, propane, and/or LPG.	IDAPA 58.01.01.317.01.B(5)
Combustion source, not greater than 0.5 MMBTU/hr, if burning waste wood, wood waste, or waste paper.	IDAPA 58.01.01.317.01.B(8)
Welding using not more than One T/day of welding rod.	IDAPA 58.01.01.317.01.B(9)
"Parylene" coaters using less than 500 gallons of coating per year.	IDAPA 58.01.01.317.01.B(11)
Printing and silk-screening, using less than two gal/day of a combination of inks, coatings, adhesives, fountain solutions, thinners, retarders, or nonaqueous cleaning solutions.	IDAPA 58.01.01.317.01.B(12)
Water cooling towers, not using chromium-based corrosion inhibitors, not using barometric jets or condensers, not greater than 10,000 gal/min, and not in direct contact with gaseous or liquid process streams containing regulated air pollutants.	IDAPA 58.01.01.317.01.B(13)
Industrial water chlorination, less than 20 million gal/day capacity.	IDAPA 58.01.01.317.01.B(16)
Surface coating, using less than two gal/day.	IDAPA 58.01.01.317.01.B(17)
Space heaters and hot water heaters using natural gas, propane or kerosene and generating less than five MMBtu/hr.	IDAPA 58.01.01.317.01.B(5)
Tanks, vessels, and pumping equipment, with lids or other appropriate closure, for storage or dispensing of aqueous solutions of inorganic salts, bases and acids, excluding solutions with: 99% or greater sulfuric or phosphoric acid; 77% or greater nitric acid; 30% or greater hydrochloric acid; or more than one liquid phase where the top phase is more than 1% VOC.	IDAPA 58.01.01.317.01.B(19)
Equipment, with lids or other appropriate closure, used exclusively to pump, load, unload, or store high-boiling-point organic material, with initial boiling point not less than 150°C or vapor pressure not more than five mmHg at 21°C.	IDAPA 58.01.01.317.01.B(20)
Milling and grinding activities (paste forms, if used, are less than 1% volatile organic compounds).	IDAPA 58.01.01.317.01.B(22)
Rolling, forging, drawing, stamping, shearing, and spinning metals.	IDAPA 58.01.01.317.01.B(23)
Dip-coating operations using materials with less than 1% VOC.	IDAPA 58.01.01.317.01.B(24)
Surface coating, aqueous solution or suspension containing less than 1% VOC.	IDAPA 58.01.01.317.01.B(25)
Cleaning and stripping activities and equipment, using solutions having less than 1% volatile organic compounds by weight (no acid cleaning or stripping on metal substrates).	IDAPA 58.01.01.317.01.B(26)

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-060315

Permittee:	Basic American Foods	Facility ID No. 011-00012
Location:	Blackfoot, Idaho	

Description	Insignificant Activities IDAPA 58.01.01.317.01(b)(I) Citation
Storage and handling of water based lubricants for metal working with organic content less than 10%.	IDAPA 58.01.01.317.01.B(27)
Process A - DKW (vent from Process Equipment)	IDAPA 58.01.01.317.01.B(30)
Process A - DKV (vent from Process Equipment)	IDAPA 58.01.01.317.01.B(30)
Process B- DXS (vent from Process Equipment)	IDAPA 58.01.01.317.01.B(30)
Process B- DUO (vent from Process Equipment)	IDAPA 58.01.01.317.01.B(30)
Process B- DPY (vent from Process Equipment)	IDAPA 58.01.01.317.01.B(30)
Process B- DPZ (vent from Process Equipment)	IDAPA 58.01.01.317.01.B(30)
Process B- DUY (vent from Process Equipment)	IDAPA 58.01.01.317.01.B(30)
Process B- DUZ (vent from Process Equipment)	IDAPA 58.01.01.317.01.B(30)
Process B- DSO (vent from Process Equipment)	IDAPA 58.01.01.317.01.B(30)
Process B- DSK (vent from Process Equipment)	IDAPA 58.01.01.317.01.B(30)
Process B- DUU (vent from Process Equipment)	IDAPA 58.01.01.317.01.B(30)
Process B- DRY (vent from Process Equipment)	IDAPA 58.01.01.317.01.B(30)
Process C - ALB (vent from Process Equipment)	IDAPA 58.01.01.317.01.B(30)
Process C - ALQ (vent from Process Equipment)	IDAPA 58.01.01.317.01.B(30)
Process C - ALT (vent from Process Equipment)	IDAPA 58.01.01.317.01.B(30)
Process C - ALY (vent from Process Equipment)	IDAPA 58.01.01.317.01.B(30)
Process C - ALX (vent from Process Equipment)	IDAPA 58.01.01.317.01.B(30)
Process C - ALV (vent from Process Equipment)	IDAPA 58.01.01.317.01.B(30)
Process C - ALW (vent from Process Equipment)	IDAPA 58.01.01.317.01.B(30)
Process C - AEV (vent from Process Equipment)	IDAPA 58.01.01.317.01.B(30)
Process C - AEW (vent from Process Equipment)	IDAPA 58.01.01.317.01.B(30)
Process C - AGQ (vent from Process Equipment)	IDAPA 58.01.01.317.01.B(30)
Process C - CHV (vent from Process Equipment)	IDAPA 58.01.01.317.01.B(30)
Process C - IBE (vent from Process Equipment)	IDAPA 58.01.01.317.01.B(30)
Process C - CHY (vent from Process Equipment)	IDAPA 58.01.01.317.01.B(30)
Process C - CHZ (vent from Process Equipment)	IDAPA 58.01.01.317.01.B(30)
Process C - HNL (vent from Process Equipment)	IDAPA 58.01.01.317.01.B(30)
Process C - CBB (vent from Process Equipment)	IDAPA 58.01.01.317.01.B(30)
Process C - CTQ (vent from Process Equipment)	IDAPA 58.01.01.317.01.B(30)
Process C - CTR (vent from Process Equipment)	IDAPA 58.01.01.317.01.B(30)
Process C - CTS (vent from Process Equipment)	IDAPA 58.01.01.317.01.B(30)
Process C - CTT (vent from Process Equipment)	IDAPA 58.01.01.317.01.B(30)
Process C - TCD (vent from Process Equipment)	IDAPA 58.01.01.317.01.B(30)
Process C - TCO (vent from Process Equipment)	IDAPA 58.01.01.317.01.B(30)
Process C - TAC (vent from Process Equipment)	IDAPA 58.01.01.317.01.B(30)
Process C - TAH (vent from Process Equipment)	IDAPA 58.01.01.317.01.B(30)
Process C - TEM (vent from Process Equipment)	IDAPA 58.01.01.317.01.B(30)
Process C - TEE (vent from Process Equipment)	IDAPA 58.01.01.317.01.B(30)
Process C - ENV (vent from Process Equipment)	IDAPA 58.01.01.317.01.B(30)
Process C - EUW (vent from Process Equipment)	IDAPA 58.01.01.317.01.B(30)
Process C - ENR (vent from Process Equipment)	IDAPA 58.01.01.317.01.B(30)
Process C - EDO (vent from Process Equipment)	IDAPA 58.01.01.317.01.B(30)
Process C - ESX (vent from Process Equipment)	IDAPA 58.01.01.317.01.B(30)
Process C - EGS (vent from Process Equipment)	IDAPA 58.01.01.317.01.B(30)
Process C - EGT (vent from Process Equipment)	IDAPA 58.01.01.317.01.B(30)
Process C - FIF (vent from Process Equipment)	IDAPA 58.01.01.317.01.B(30)
Process C - CHK (vent from Process Equipment)	IDAPA 58.01.01.317.01.B(30)
Process C - CHI (vent from Process Equipment)	IDAPA 58.01.01.317.01.B(30)

- 8.1 There are no monitoring, recordkeeping, or reporting requirements for insignificant emission units or activities beyond those required in the Facility-wide Permit Conditions.

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-060315		
Permittee:	Basic American Foods	Facility ID No. 011-00012
Location:	Blackfoot, Idaho	

9. NONAPPLICABLE REQUIREMENTS

State and federal air quality requirements (e.g., rules and regulations) currently determined not applicable to the permittee are listed below along with the reason for the non-applicability: [IDAPA 58.01.01.325.01(b)]

**Table 8.1 STATE AND FEDERAL AIR QUALITY REQUIREMENTS
CURRENTLY DETERMINED NOT APPLICABLE TO THE PERMITTEE**

<u>Requirement</u>	<u>Reason Code</u>
IDAPA Chapter 58.01.01:	
Section 214 Preconstruction Requirements for Major HAP Sources	b
Section 336 Tier I Permits for Portable Sources	b
Section 500 Registration for Portable Equipment	b
Section 563-574 Transportation Conformity	b
Section 580 Classification of PSD Areas	i
Section 582 Conformity for Northern Ada County PM-10 Maintenance Area	d
Section 610-613 Industrial Flares, Residential Waste Fires, Landfill Site Fires, Orchard Fires	b
Section 626 Visible Emissions from Wigwam Burners	b
Section 776.02 Odors from Rendering Plants	b
Section 750-751 Control of Fluoride Emissions	a
Section 790-999 Rules for Specific Source Categories	b
40 CFR	
Part 49 Tribal Clean Air Authority	c
Part 51 Sections 51.1-51.45	i
Part 55 OCS Air Regulations	b
Part 56 Regional Consistency	i
Part 57 Nonferrous Smelter Rules	b
Part 59 VOC Standards for Consumer and Commercial Products	b
Part 60, except subparts A, Dc, and appendixes	b
Part 61, except subpart A, M, and appendixes	b
Part 62 Approval and Promulgation of State Plans for Designated Facilities and Pollutants	b
Part 63 National Emission Standards for Hazardous Air Pollutants	j
Part 64 Compliance Assurance Monitoring (CAM)	g
Part 71 through 80	b
Part 82, except subpart F	b
Parts 85 through 94	b

Reason code definitions:

- a this pollutant is not emitted by the facility
- b the facility is not currently in this source category
- c the facility is not in a special control/nonattainment area
- d the facility is not in this county
- e the facility does not have this emissions unit
- f the facility does not use this fuel type
- g the facility does not have any emissions units which are subject to CAM requirements, as determined under 40 CFR 64.2
- h this method/procedure is not used by the facility
- i this rule applies only to DEQ and regional authorities
- j the facility is not a major source of HAP emissions

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-060315		
Permittee:	Basic American Foods	Facility ID No. 011-00012
Location:	Blackfoot, Idaho	

10. TIER I OPERATING PERMIT GENERAL PROVISIONS

General Compliance

1. The permittee shall comply with all conditions of this permit. Any permit noncompliance constitutes a violation and is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application.
[IDAPA 58.01.01.322.15.a, 5/1/94; 40 CFR 70.6(a)(6)(i)]
2. It shall not be a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the terms and conditions of this permit.
[IDAPA 58.01.01.322.15.b, 5/1/94; 40 CFR 70.6(a)(6)(ii)]
3. Any permittee who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information.
[IDAPA 58.01.01.315.01, 5/1/94; 40 CFR 70.5(b)]

Reopening

4. This permit may be revised, reopened, revoked and reissued, or terminated for cause. Cause for reopening exists under any of the circumstances listed in IDAPA 58.01.01.386. Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable in accordance with IDAPA 58.01.01.360 through 369.
[IDAPA 58.01.01.322.15.c, 5/1/94; IDAPA 58.01.01.386, 3/19/99; 40 CFR 70.7(f)(1), (2); 40 CFR 70.6(a)(6)(iii)]
5. The filing of a request by the permittee for a permit revision, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
[IDAPA 58.01.01.322.15.d, 5/1/94; 40 CFR 70.6(a)(6)(iii)]

Property Rights

6. This permit does not convey any property rights of any sort, or any exclusive privilege.
[IDAPA 58.01.01.322.15.e, 5/1/94; 40 CFR 70.6(a)(6)(iv)]

Information Requests

7. The permittee shall furnish all information requested by DEQ, within a reasonable time, that DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.
[Idaho Code §39-108; IDAPA 58.01.01.122, 4/5/00; IDAPA 58.01.01.322.15.f, 4/5/00; 40 CFR 70.6(a)(6)(v)]

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-060315		
Permittee:	Basic American Foods	Facility ID No. 011-00012
Location:	Blackfoot, Idaho	

8. Upon request, the permittee shall furnish to DEQ copies of records required to be kept by this permit. For information claimed to be confidential, the permittee may furnish such records along with a claim of confidentiality in accordance with Idaho Code §9-342A and applicable implementing regulations including IDAPA 58.01.01.128.
[IDAPA 58.01.01.322.15.g, 5/1/94; IDAPA 58.01.01.128, 4/5/00; 40 CFR 70.6(a)(6)(v)]

Severability

9. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.
[IDAPA 58.01.01.322.15.h, 5/1/94; 40 CFR 70.6(a)(5)]

Changes Requiring Permit Revision or Notice

10. The permittee may not commence construction or modification of any stationary source, facility, major facility, or major modification without first obtaining all necessary permits to construct or an approval under IDAPA 58.01.01.213, or complying with IDAPA 58.01.01.220 through 223. The permittee shall comply with IDAPA 58.01.01.380 through 386 as applicable.
[IDAPA 58.01.01.200-223, 4/6/05; IDAPA 58.01.01.322.15.i, 3/19/99; IDAPA 58.01.01.380-386, 7/1/02; 40 CFR 70.4(b)(12), (14), (15), and 70.7(d), (e)]
11. Changes that are not addressed or prohibited by the Tier I operating permit require a Tier I operating permit revision if such changes are subject to any requirement under Title IV of the CAA, 42 U.S.C. Section 7651 through 7651c, or are modifications under Title I of the CAA, 42 U.S.C. Section 7401 through 7515. Administrative amendments (IDAPA 58.01.01.381), minor permit modifications (IDAPA 58.01.01.383), and significant permit modifications (IDAPA 58.01.01.382) require a revision to the Tier I operating permit. IDAPA 58.01.01.502(b)(10) changes are authorized in accordance with IDAPA 58.01.01.384. Off-permit changes and required notice are authorized in accordance with IDAPA 58.01.01.385.
[IDAPA 58.01.01.381-385, 7/1/02; IDAPA 58.01.01.209.05, 4/5/00; 40 CFR 70.4(b)(14) and (15)]

Federal and State Enforceability

12. Unless specifically identified as a “State-only” provision, all terms and conditions in this permit, including any terms and conditions designed to limit a source’s potential to emit, are enforceable: (i) by DEQ in accordance with state law; and (ii) by the United States or any other person in accordance with federal law.
[IDAPA 58.01.01.322.15.j, 5/1/94; 40 CFR 70.6(b)(1) and (2)]
13. Provisions specifically identified as a “State-only” provision are enforceable only in accordance with state law. “State-only” provisions are those that are not required under the Federal Clean Air Act or under any of its applicable requirements or those provisions adopted by the state prior to federal approval.
[Idaho Code §39-108; IDAPA 58.01.01.322.15.k, 3/23/98]

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-060315		
Permittee:	Basic American Foods	Facility ID No. 011-00012
Location:	Blackfoot, Idaho	

Inspection and Entry

14. Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:
- Enter upon the permittee's premises where a Tier I source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;
 - Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
 - Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108; IDAPA 58.01.01.322.15.i, 3/19/99; 40 CFR 70.6(c)(2)]

New Requirements During Permit Term

15. The permittee shall comply with applicable requirements that become effective during the permit term on a timely basis.

[IDAPA 58.01.01.322.10, 4/6/05; IDAPA 58.01.01.314.10.a.ii, 5/1/94; 40 CFR 70.6(c)(3) citing 70.5(c)(8)]

Fees

16. The owner or operator of a Tier I source shall pay annual registration fees to DEQ in accordance with IDAPA 58.01.01.387 through IDAPA 58.01.01.397.

[IDAPA 58.01.01.387, 4/2/03; 40 CFR 70.6(a)(7)]

Certification

17. All documents submitted to DEQ shall be certified in accordance with IDAPA 58.01.01.123 and comply with IDAPA 58.01.01.124.

[IDAPA 58.01.01.322.15.o, 5/1/94; 40 CFR 70.6(a)(3)(iii)(A); 40 CFR 70.5(d)]

Renewal

- The owner or operator of a Tier I source shall submit an application to DEQ for a renewal of this permit at least six months before, but no earlier than 18 months before, the expiration date of this operating permit. To ensure that the term of the operating permit does not expire before the permit is renewed, the owner or operator is encouraged to submit a renewal application nine months prior to the date of expiration.

[IDAPA 58.01.01.313.03, 4/5/00; 40 CFR 70.5(a)(1)(iii)]

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-060315		
Permittee:	Basic American Foods	Facility ID No. 011-00012
Location:	Blackfoot, Idaho	

- b. If a timely and complete application for a Tier I operating permit renewal is submitted, but DEQ fails to issue or deny the renewal permit before the end of the term of this permit, then all the terms and conditions of this permit including any permit shield that may have been granted pursuant to IDAPA 58.01.01.325 shall remain in effect until the renewal permit has been issued or denied.
[IDAPA 58.01.01.322.15.p, 5/1/94; 40 CFR 70.7(b)]

Permit Shield

19. Compliance with the terms and conditions of the Tier I operating permit, including those applicable to all alternative operating scenarios and trading scenarios, shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:
- Such applicable requirements are included and are specifically identified in the Tier I operating permit; or
 - DEQ has determined that other requirements specifically identified are not applicable and all of the criteria set forth in IDAPA 58.01.01.325.01(b) have been met.
 - The permit shield shall apply to permit revisions made in accordance with IDAPA 58.01.01.381.04 (administrative amendments incorporating the terms of a permit to construct), IDAPA 58.01.01.382.04 (significant modifications), and IDAPA 58.01.01.384.03 (trading under an emissions cap).
 - Nothing in this permit shall alter or affect the following:
 - Any administrative authority or judicial remedy available to prevent or terminate emergencies or imminent and substantial dangers;
 - The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - The applicable requirements of the acid rain program, consistent with 42 U.S.C. Section 7651(g)(a); and
 - The ability of EPA to obtain information from a source pursuant to Section 114 of the CAA; or the ability of DEQ to obtain information from a source pursuant to Idaho Code §39-108 and IDAPA 58.01.01.122.

**[Idaho Code §39-108 and 112; IDAPA 58.01.01.122, 4/5/00;
 IDAPA 58.01.01.322.15.m, 325.01, 5/1/94; IDAPA 58.01.01.325.02, 3/19/99;
 IDAPA 58.01.01.381.04, 382.04, 383.05, 384.03, 385.03, 3/19/99; 40 CFR 70.6(f)]**

Compliance Schedule and Progress Reports

20.
 - For each applicable requirement for which the source is not in compliance, the permittee shall comply with the compliance schedule incorporated in this permit.
 - For each applicable requirement that will become effective during the term of this permit and that provides a detailed compliance schedule, the permittee shall comply with such requirements in accordance with the detailed schedule.
 - For each applicable requirement that will become effective during the term of this permit that does not contain a more detailed schedule, the permittee shall meet such requirements on a timely basis.

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-060315		
Permittee:	Basic American Foods	Facility ID No. 011-00012
Location:	Blackfoot, Idaho	

- d. For each applicable requirement with which the permittee is in compliance, the permittee shall continue to comply with such requirements.
[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.9, 5/1/94; IDAPA 58.01.01.314.10, 4/5/00; 40 CFR 70.6(c)(3) and (4)]

Periodic Compliance Certification

21. The permittee shall submit compliance certifications during the term of the permit for each emissions unit to DEQ and the EPA as follows:
- a. The compliance certifications for all emissions units shall be submitted annually from January 1 to December 31 or more frequently if specified by the underlying applicable requirement or elsewhere in this permit by DEQ.
 - b. The initial compliance certification for each emissions unit shall address all of the terms and conditions contained in the Tier I operating permit that are applicable to such emissions unit including emissions limitations, standards, and work practices;
 - c. The compliance certification shall be in an itemized form providing the following information (provided that the identification of applicable information may cross-reference the permit or previous reports as applicable):
 - i. The identification of each term or condition of the Tier I operating permit that is the basis of the certification;
 - ii. The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period. Such methods and other means shall include, at a minimum, the methods and means required under Subsections 322.06, 322.07, and 322.08;
 - iii. The status of compliance with the terms and conditions of the Tier I operating permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in Subsection 322.11.c.ii. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred.
 - iv. Such other facts as DEQ may require to determine the compliance status of the source.
 - d. All original compliance certifications shall be submitted to DEQ and a copy of all compliance certifications shall be submitted to the EPA.

[IDAPA 58.01.01.322.11, 4/6/05; 40 CFR 70.6(c)(5)(iii) as amended, 62 Fed. Reg. 54900, 54946 (10/22/97); 40 CFR 70.6(c)(5)(iv)]

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-060315		
Permittee:	Basic American Foods	Facility ID No. 011-00012
Location:	Blackfoot, Idaho	

False Statements

22. No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.
[IDAPA 58.01.01.125, 3/23/98]

No Tampering

23. No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.
[IDAPA 58.01.01.126, 3/23/98]

Semiannual Monitoring Reports

24. In addition to all applicable reporting requirements identified in this permit, the permittee shall submit reports of any required monitoring at least every six months. The permittee's semiannual reporting periods shall be from January 1 to June 30 and July 1 to December 31. All instances of deviations from this operating permit's requirements must be clearly identified in the report. The semiannual reports shall be submitted to DEQ within 30 days of the end of the specified reporting period.
[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.322.08.c, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

Reporting Deviations and Excess Emissions

25. The permittee shall promptly report all deviations from permit requirements including upset conditions, their probable cause, and any corrective actions or preventive measures taken. For excess emissions, the report shall be made in accordance with IDAPA 58.01.01.130-136. For all other deviations, the report shall be made in accordance with IDAPA 58.01.01.322.08.c, unless otherwise specified in this permit.
[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.135, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

Permit Revision Not Required

26. No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit.
[IDAPA 58.01.01.322.05.b, 4/5/00; 40 CFR 70.6(a)(8)]

Emergency

27. In accordance with IDAPA 58.01.01.332, an "emergency" as defined in IDAPA 58.01.01.008, constitutes an affirmative defense to an action brought for noncompliance with such technology-based emissions limitation if the conditions of IDAPA 58.01.01.332.02 are met.
[IDAPA 58.01.01.332.01, 4/5/00; 40 CFR 70.6(g)]

Attachment A – EPA Approval of NSPS Subpart Dc Alternative to COMS



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10
1200 Sixth Avenue
Seattle, WA 98101

Reply To
Attn Of: AWT - 107

29 SEP 2005

Mr. Bruce Wright
Sr. Project Manager, Environmental
Basic American Foods
415 W Collins Road
Blackfoot, Idaho 83221-5668

Re: NSPS Subpart Dc Alternative to COMS for Boiler Re-firing Project at Blackfoot, Idaho

Dear Mr. Wright:

This alternative monitoring determination is in response to a request sent to the Environmental Protection Agency (EPA) by Basic American Foods (BAF) submitted on August 8, 2005, and followed up with more information submitted by the Idaho Department of Environmental Quality (IDEQ) dated September 16, 2005. BAF and IDEQ are requesting approval of an alternative plan for monitoring opacity in lieu of a Continuous Opacity Monitoring System (COMS). A COMS will not provide accurate measurements due to water vapor from a proposed wet scrubber. EPA approves the alternative monitoring plan as described in the September 16, 2005, letter from IDEQ and as detailed below.

Background

The proposed project at the BAF Blackfoot facility involves two boilers (Boilers 1 and 2) neither of which are currently subject to New Source Performance Standards (NSPS). The status for boilers 1 and 2 before the proposed change is as follows:

- Boiler 1 has a heat input of 57 MM Btu/hr when firing natural gas.
 - Currently Boiler 1 is also permitted to combust up to 5,450 gallons/day of No. 6 residual fuel oil or No. 2 diesel fuel oil, uncontrolled.
 - This results in annual sulfur dioxide (SO₂) emissions of 210 tons per year (TPY).
- Boiler 2 has a heat input of 73.5 MM Btu/hr when firing natural gas.
 - Currently Boiler 2 is also permitted to combust low sulfur (0.05 weight percentage sulfur) No. 2 diesel fuel oil at full fire for up to 60 day/yr, uncontrolled.
 - This results in annual SO₂ emissions of 2.8 TPY.

BAF plans to modify Boiler 2 in order to enable it to combust No. 6 residual fuel oil. This modification will make Boiler 2 subject to 40 CFR Part 60, Subpart Dc the Standards of



Performance for Small Industrial-Commercial-Institutional Steam Generating Units (Subpart Dc) and the NSPS General provisions in 40 CFR Part 60 Subpart A (General Provisions).

In order to avoid applicability to the Prevention of Significant Deterioration (PSD) permitting process, BAF has proposed the following:

- BAF will limit the amount of residual oil combusted and the quantity of steam produced per hour as proscribed in a federally enforceable permit issued by IDEQ, and
- BAF will install controls in the form of a venturi-type wet scrubber that will control the emissions from both boilers.

The control of emissions will be accomplished by merging the exhausts from Boiler 1 and Boiler 2, scrubbing the merged exhaust stream with a single venturi-type wet scrubber, and venting the scrubbed steam through the existing stack for Boiler 1. BAF estimates that the combined controlled SO₂ emissions from both boilers are not expected to exceed 145 TPY. This would represent a reduction of 65 TPY compared to the uncontrolled SO₂ emissions currently allowed for Boiler 1 alone. The wet scrubber will also reduce particulate matter emissions with a capture efficiency of at least 50 percent.

Determination

Because Boiler 2 will be modified and become subject to NSPS Subpart Dc and the General provisions, the COMS requirement in 40 CFR §60.47c(a) of Subpart Dc is now applicable to Boiler 2. This requirement specifies that a COMS must be installed to measure and record the opacity when Boiler 2 fires fuel oil. In lieu of the COMS, BAF has requested to implement alternative opacity monitoring requirements according to the provisions of 40 CFR 60.13(h)(i)(1). This section allows the applicant to submit a written application for alternative opacity monitoring requirements when "installation of a continuous emission monitoring system or monitoring device specified by this part would not provide accurate measurement due to liquid water or other interferences caused by substances with the effluent gasses." EPA has previously approved similar requests, which are posted on the EPA's applicability determination index (see EPA Determination Control No. 0000010 and Control No. 0300073). In previous requests EPA has determined that the continuous monitoring of the scrubbing liquid flow rate and the pressure drop of the gas stream across the scrubber is acceptable as alternative monitoring to the COMS.

In lieu of operating a COMS as is required by 40 CFR §60.47c(a), IDEQ has recommended and BAF has agreed to the following alternative monitoring requirements for Boiler 2.

1. BAF's permit to construct (PTC) No. P-050301 will require all of the following: The wet scrubbing system shall be operated during all times that residual oil is fired in Boiler 2. Basic American Foods shall install, calibrate, operate, and maintain equipment to measure each of the following operating parameters for the wet scrubbing system. Each of the following operating parameters shall be maintained within the specifications established in the permit or specifications established through source testing under worse case normal conditions:

- a) Pressure drop across the scrubber
 - b) Scrubbing solution pH
 - c) Scrubbing solution flow rate
 - d) Fuel consumption
 - e) Steam production (calculated)
2. Basic American Foods shall calibrate each instrument in accordance with the manufacturer's recommendation; nevertheless, Basic American Foods shall calibrate each piece of equipment at least every six months. Each calibration for each piece of equipment shall be recorded and available for inspection in accordance with the terms of the permit. The facility noted that the equipment might be self-calibrating. In this case, manufacturer's documentation of the self-calibration will be required to be kept on site and available for inspection.
 3. Section 4.5 of the PTC will reference this alternative monitoring plan. This section of the plan references the permit. If a change to the permit will affect this plan, Basic American Foods shall request a change to this monitoring plan and a change to the permit. If a change to this plan will not affect the permit, only a change to this plan is required to be requested. When a permit change is requested that will not affect this plan, only the permit change is required to be requested. This requirement is to ensure the monitoring plan and the permit remain consistent as future changes are made to either the permit or this monitoring plan.
 4. Basic American Foods shall continuously monitor the scrubbing liquid flow rate and the pressure drop of the gas stream across the scrubber serving Boiler 2 whenever Boiler 2 combusts fuel oil. Once per hour, Basic American Foods shall record the hourly average scrubbing liquid flow rate and pressure drop of the gas stream. Note that Boiler 1 is not subject to the NSPS; therefore, this requirement does not apply to Boiler 1, except when Boiler 1 operates simultaneously when Boiler 2 combusts fuel oil.
 5. Basic American Foods shall conduct a 6-minute opacity observation every day for days 1-14 of operation when Boiler 2 combusts fuel oil to monitor directly the opacity of emissions from the stack. Thereafter, Basic American Foods shall conduct a 6-minute opacity observation once every 14 days for days 15-45 of operation when Boiler 2 combusts fuel oil to directly monitor the opacity of emissions from the stack. Thereafter, Basic American Foods shall conduct a 6-minute opacity observation once every 30 days for days of operation from day 46 when Boiler 2 combusts fuel oil to directly monitor the opacity of emissions from the stack. Opacity observations shall be conducted utilizing Method 9. Note that Boiler 1 is not subject to the NSPS; therefore, this requirement does not apply to Boiler 1, except when Boiler 1 operates simultaneously when Boiler 2 combusts fuel oil. To clarify, there will be fourteen (14) data points according to the first requirement, two (2) data points in accordance with the second requirement, and one (1) data point every 30 days thereafter when Boiler 2 combusts fuel oil.
 6. If any 6-minute opacity observation results in any single observation greater than 20%, Basic American Foods shall conduct a 60-minute Method 9 opacity observation. If the 60 minute opacity observation results in opacity greater than 20% for any 6-minute period, except for

one 6-minute period (average) of not more than 27% opacity, then Basic American Foods shall revert back to the start of the schedule outlined above in item number 5 (i.e., collecting fourteen (14) data points according to the first requirement, two (2) data points in accordance with the second requirement, and one (1) data point every 30 days thereafter when Boiler 2 combusts fuel oil.)

7. Basic American Foods shall maintain records of the scrubbing liquid flow rate, the pressure drop of the gas stream across the scrubber, fuel usage, steam generation, and opacity observations in accordance with the terms of the permit. If the opacity exceeds 20%, Basic American Foods shall take immediate corrective action to reduce the opacity. Opacity observations and corrective actions shall be documented hourly when opacity is greater than 20%.
8. In accordance with 40 CFR 70.6(a)(3)(iii), BAF shall submit reports of excess emissions semiannually to IDEQ. All reports shall be postmarked within 30 days following the end of the reporting period. These are the initial start-up parameters to be confirmed by the initial source test^{1,2}:
 - a) any period when the 1-hour average scrubbing liquid flow rate is less than 323 gallons per minute;
 - b) any period when the 1-hour average pressure drop of the gas stream across the scrubber is less than 10 inches of water column or more than 15 inches of water column; and
 - c) any period when the Method 9 opacity exceeds 20% (6-minute average), except for one six-minute average per hour of not more than 27% opacity.

BAF shall conduct Method 9 observations to verify limits for the prescribed scrubber operating parameters. Scrubber operating parameters and Method 9 observations shall be collected over a three-hour period while the boiler is operating under normal conditions and in compliance with the 20% opacity standard.

9. Paragraph 3.7 of BAF's PTC No. P-050301 includes the following: "Within 60 days after startup of the wet scrubbing system, the permittee shall have developed an O&M manual for the wet scrubbing system which describes the procedures that will be followed to comply with the PTC General Provisions and manufacturers specifications for the air pollution control device. At a minimum, the following items shall be addressed in the manual:
 - Inspection checklists for items that will be periodically inspected while the treatment system is operating, including frequency of inspection.
 - Inspection checklist for items that will be inspected when the device is taken out of operation and physically opened for inspection (e.g., internal components), including frequency of these internal inspections.

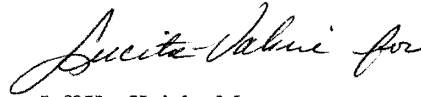
1 Operating outside these initial start-up limits, except during performance testing, shall be considered excess emissions until the performance tests confirm the different operating limits.

2 Operating parameters may be modified upon completion of testing that demonstrates compliance with emissions limits.

- Periodic planned maintenance for the control devices, including the burner itself.

EPA has found that the above proposed alternative monitoring is at least as protective as previously approved requests in similar circumstances, where the operation of a wet scrubbing control device necessitates alternative monitoring in lieu of COMS. Therefore, EPA determines that the proposed alternative monitoring described above is acceptable in lieu of COMS for Boiler 2. If there are any changes in operation from what is described here, this determination is no longer valid. If you have any further questions or concerns, please contact Heather Valdez of the Region 10 Office of Air, Waste, and Toxics at (206) 553-6220.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jeff KenKnight for".

Jeff KenKnight, Manager
Federal and Delegated Air Programs Unit
Office of Air, Waste, and Toxics

cc: Pete Wagner, IDEQ PRO
Dan Pitman, IDEQ, State Office
Ken Hanna, IDEQ, State Office